

Jim Betts, Secretary
NSW Department of Planning, Industry and
Environment
GPO Box 39
Sydney NSW 2001

Attention: Jazmin van Veen, Manager Place
and Infrastructure, Central (GPOP)

Your Reference	N/A
Our Reference	F2019/01712
Contact	Mark Egan
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30 March 2021

Dear Mr Betts,

Draft Westmead Place Strategy – City of Parramatta Submission

Please find attached City of Parramatta Council's formal submission to the Draft Westmead Place Strategy. At its meeting on 22 March 2021, Council considered the draft submission prepared by Council officers and resolved to endorse it for submission to the Department.

In addition to its endorsement of the submission, Council reinforced the need for the Department to complete the traffic and transport work proposed in the draft Strategy prior to any Strategy being endorsed by the Minister. Council also resolved to investigate "the risks and benefits of Council suspending consideration of Planning Proposals and assessment of Development Applications, unless the proposals or applications relate solely to increasing and/or supporting community health services, until the Minister for Planning and Public Spaces has approved the Strategy based on a comprehensive traffic and transport study, and Council has completed the analysis and consultation required to determine land use and density controls that are consistent with the Strategy."

Should you require any further information or wish to discuss this matter, please contact Council's Senior Project Officer Social Outcomes, Mark Egan, on 9806 5797 or megan@cityofparramatta.nsw.gov.au.

Yours sincerely



David Birds

A/Executive Director City Planning and Design

Attachment

City of Parramatta's formal submission to the Draft Westmead Place Strategy

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Draft Westmead Place Strategy



Submission

City of Parramatta Council

23 March 2021

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Executive Summary

On 10 December 2020 the Department of Planning, Industry and Environment (DPIE) released a draft Westmead Place Strategy for public exhibition. The draft Westmead Place Strategy aims to synthesise a vision for the whole Precinct, leverage off significant State Infrastructure investment, and support Westmead's role in Greater Parramatta as identified in the Central City District Plan.

The Place Strategy itself is broad in focus, with limited detail provided when compared to the Westmead Alliance's and Council's previous masterplanning work on the Westmead Precinct. Its key elements are a structure plan for Westmead, a set of planning priorities and actions that are arranged under 12 Directions, and a series of maps showing the sub-precincts that make up Westmead and the outcomes sought in each location.

Of key concern to Council are the specific details contained in the structure plan, and the actions that the Place Strategy contains, particularly those actions that are allocated to Council to undertake. What is equally important to note is what this Place Strategy does *not* contain: supporting technical studies, the most critical omission being the lack of any traffic and transport study to support its plans for jobs and housing growth.

Any future vision and its successful implementation at Westmead requires a coordinated and considered approach from all three levels of Government – as well as consistent engagement with private industry and investment. A 'City Deal' style agreement is critical to realising the true potential of the precinct, as a centre of high value jobs, world class health and true innovation. The existing Launceston and Townsville City deals suggest that a Westmead proposal clearly has adequate potential national impact to be considered for such an arrangement.

This submission was endorsed by Council at its meeting on the 22 March 2021.

The key issues that Council believes need to be addressed in the draft Westmead Place Strategy, prior to its finalisation are as follows:

1. That in order for Westmead to succeed and reach its potential, it is imperative that Federal, State and Local government interests and commitments align in this significant precinct. Council recommends a City Deal model be considered, to help maximise impact of all government investment in Westmead and improve the physical nature of how the Precinct operates and connects to the surrounding area.
2. That the Strategy be amended to recognise and utilise to a much greater extent the previous work undertaken by DPIE, GSC and the Westmead Alliance, in order for the Strategy to be finalised and be reformulated into an achievable Action Plan.
3. That the existing technical studies already undertaken for the precinct by DPIE, GSC, Councils and the Westmead Alliance be synthesised and the infrastructure needs of the Precinct be more clearly defined and local and state infrastructure identified, costed and funding sources identified.
4. That as a critical next step, a comprehensive traffic and transport study is undertaken which considers the cumulative impact of growth and the broader population increases projected for the wider GPOP area. The study should include modelling and analysis of current and future traffic flows. Without this analysis, one of the fundamental constraints for the precinct cannot be adequately addressed

5. That a final Strategy identify land uses and include overarching job and dwelling numbers in line with current strategic plans and be informed by key studies (traffic, flooding, social infrastructure assessment).
6. The infrastructure needs of the Precinct be defined by the completion of the technical work and local and state infrastructure identified, costed and funding sources be identified.
7. The Draft Strategy identifies the completion of 18 studies, plans or strategies, of which Council is directly involved, to support the realisation of the Strategy. Council seeks clarity from DPIE as to how the significant amount of work identified in the draft Place Strategy will be resourced, and specifically, what Council will be expected to pay for, and what DPIE will contribute with respect to funding.

Part 1 of this document provides an introduction to the draft Westmead Place Strategy as well as Council's previous masterplanning work in Westmead as part of the Westmead Alliance.

Part 2 contains a detailed assessment of the draft Westmead Place Strategy prepared by Council officers.

Part 3 of this document summarises the list of the key recommendations made throughout the submission.

Part 1 – Introduction

1.1 The Draft Westmead Place Strategy

On 10 December 2020 the Department of Planning, Industry and Environment (DPIE) released a draft Westmead Place Strategy for public exhibition until 31 March 2021.

The draft Place Strategy aims to synthesise a vision for the whole Precinct, leverage off significant State Infrastructure investment, and support Westmead's role in Greater Parramatta as identified in the Central City District Plan.

The draft Westmead Place Strategy is structured as follows:

- Introduction, including context-setting information
- A proposed vision for Westmead
- Big Moves, designed to distill the Place Strategy into five broad intentions as follows:
 1. Drive change in the innovation eco-system to accelerate delivery of Australia's premier health and innovation district;
 2. Cherish and protect places of significance, conserve and revitalise heritage and cultural assets to create exceptional places;
 3. Activate and connect our community with vibrant, diverse and well-connected public spaces and places;
 4. Deliver high quality and diverse housing for students, workers and professionals with optimal livability outcomes; and
 5. Capitalise on transport connectivity and reduce car dependency.
- A structure plan in the form of a map that is largely based on Council's and the Westmead Alliance's previous master planning work.
- A Planning Framework that sets 12 Directions that are categorised under the Greater Sydney Commission's priority areas, being Connectivity, Productivity, Livability and Sustainability. Each Direction includes a set of objectives, planning priorities and actions. The actions are an important part of the Place Strategy, as many are identified as the responsibility of Council to undertake.

Council has considered a range of issues included in the draft Westmead Place Strategy, including:

1. Land Use Planning
2. Transport & Traffic
3. Open Space
4. Community Infrastructure
5. Economic Development
6. Sustainability, Green Grid Network & Flooding
7. Heritage
8. Infrastructure Planning

9. Implementation of the Strategy

This submission was endorsed by Council at its meeting on the 22 March 2021.

1.2 The Draft Westmead Innovation District Masterplan

The Westmead Alliance was formed (in the main by Parramatta Council's Lord Mayor) in 2013 to bring all of Westmead's stakeholders together to better plan for the future of the precinct and address some of the ongoing issues the Precinct faced (such as traffic congestion and poor amenity). In 2017, the Westmead Alliance commenced work on the draft Westmead Innovation District Master Plan. Jointly funded by Health NSW, City of Parramatta and University of Sydney, the project sought to address the problems faced by Westmead and also capitalise on the significant opportunities in Parramatta Light Rail and the Westmead Hospital redevelopment and propose other ideas to benefit the Precinct. Alliance members are listed in Appendix A.

Council, together with other members of the Westmead Alliance, prepared the Draft Westmead Innovation District Masterplan (WIDMP) to ensure that the future vision for Westmead was developed with the involvement of all relevant stakeholders. The success of this work is indicated by the members of the Westmead Alliance approving the draft WIDMP for public exhibition at their meeting on 3 December 2018.¹

While the draft WIDMP has not yet been made public, it was successful in influencing the NSW Government on two major projects that will enable Westmead to succeed as an innovation district:

- The inclusion of a Westmead station on the proposed Sydney Metro West route; and
- The announcement that the NSW Government is entering into negotiations with University of Sydney for a full-scale university campus at the Cumberland Precinct.

In May 2019 Council paused progress of the draft WIDMP. This decision was taken because of key pieces of work that needed to be completed or resolved for the WIDMP to be finalised. They were as follows:

- Confirmation of the location of the Sydney Metro West Station at Westmead. This is a critical piece of infrastructure that will connect the precinct with the wider metropolitan area
- Completion of the traffic and transport study for the whole of Westmead (at the time of this decision, planning for Westmead South was being led by DPIE while the Northern half of the suburb was being led by the Westmead Alliance through the WIDMP process)
- Planning associated with the Westmead South Planned Precinct to be completed by DPIE so that community consultation for the whole of the suburb can be undertaken concurrently; and

¹ Meeting held on 3 December 2018. The draft WIDMP was further updated based on feedback with the final draft version dated 12.04.19.

- Completion of the negotiations between University of Sydney and the NSW Government to develop a full-scale university campus, including preparation of a structure plan for the campus.

Since Council paused this project, details on the Sydney Metro West Station at Westmead have been released, but more detail is still to be confirmed regarding the public domain surrounding the proposed station. However:

- No traffic and transport study has been completed;
- No formal release of information on the planning for Westmead South Planned Precinct has been released; and
- No structure plan for the University of Sydney Campus at Cumberland East and Cumberland West has been released (although an agreement between the State and The University of Sydney was been announced earlier in 2018).
- Further clarity is required regarding the implications of the announcement by the NSW Government of the Global NSW scheme and Westmead as a “Lighthouse Precinct” in 2019.

In short, there are still several outstanding matters that should be resolved before finalising any kind of plan for Westmead and releasing it for public comment.

Part 2 – Assessment

This part of the submission provides a detailed assessment of the proposal. Council requests the following matters be addressed prior to finalisation of the Draft Place Strategy. Council would be pleased to meet with DPIE to discuss these matters in more detail.

2.1 Land Use Planning

2.1.1 Summary of key land use planning issues

As outlined in the Central City District Plan, Westmead is one of the largest integrated health, education and training precincts in Australia, providing health services to an estimated 10% of the Australian population. It represents around 1.6% of Western Sydney's total economic output (Employment Lands Strategy, CoP 2016), and is set to grow and diversify into a significant world-class health and education hub. A key action of the District Plan is to strengthen the precinct's economic competitiveness by "enabling the development of an internationally competitive health and education precinct at Westmead" and has identified it to have the potential to provide 50,000 jobs and support over 9,000 students by 2036.

Furthermore, the Draft Strategy identifies housing opportunity within the precinct, however it is unclear what level of intensification is proposed. Council's Local Housing Strategy (2020) and Local Strategic Planning Statement (2020) outlines that 4,470 additional homes will be accommodated within the City of Parramatta's part of the Westmead precinct to 2036 and will be an important factor supporting the workforce within the precinct.

Council believes that the Draft Place Strategy does not sufficiently demonstrate how it will meet the District Plan's vision for Westmead of realising its health and education precinct potential, nor adequately plan for an increase in resident population. The Draft Strategy proposes key land use changes, however it does not nominate projected job targets and does not identify how the Strategy fulfills the Central City District Plan goal of an additional 28,700 jobs by 2036. Furthermore, it does not identify key infrastructure (or associated land) required to support the growth.

Critical to the Strategy's successful implementation is the undertaking of a comprehensive traffic and transport study, which will determine the capacity of Westmead to accommodate the proposed uses and the density of activity that can be sustained. The Strategy should provide clearer indication that this body of work should underpin many of the other technical work, that is land use, infrastructure, residential density, which will all need to be calibrated based on the traffic study.

The Draft Strategy, in its current form does not effectively recognise, or reflect the previous in-depth work undertaken by Council and the Westmead Alliance, the DPIE and Greater Sydney Commission over the last three to four years. Rather, the draft Strategy lists action for technical studies and reports that should be pursued in order for the precinct to realise its potential. Council believes this is a backward step for planning for the precinct, and recommends the following key actions be undertaken:

- That the Strategy should be reformulated into an Action Plan that sets out the key steps to continue and finalise the previous planning processes that were underway, i.e. that DPIE and Cumberland Council lead planning work in Westmead South, and that City of Parramatta and the Westmead Alliance lead planning for Westmead North.

- That the critical transport and traffic study be commissioned and finalised, together with any remaining technical work.
- The infrastructure needs of the Precinct be defined and local and state infrastructure identified and costed.
- Prior to implementation that the Strategy identify land uses (aligned with the Standard Instrument definitions) and include overarching job and dwelling numbers in line with current strategic plans and informed by key studies (traffic, flooding, social infrastructure assessment).

Therefore, following the lodgment of this submission Council will consider a more detailed report on how future Planning Proposals might be managed between now and implementation of the Strategy and what position Council should take on whether Development Applications, including significant State Significant Development Applications, should progress ahead of the implementation of any Strategy.

2.1.2 Proposed Land Use Changed

Figure 1 below indicates the key land uses changes. Council understands are proposed under the Draft Westmead Place Strategy. An analysis of each of the proposed changes are discussed by sub-precinct in the text below.

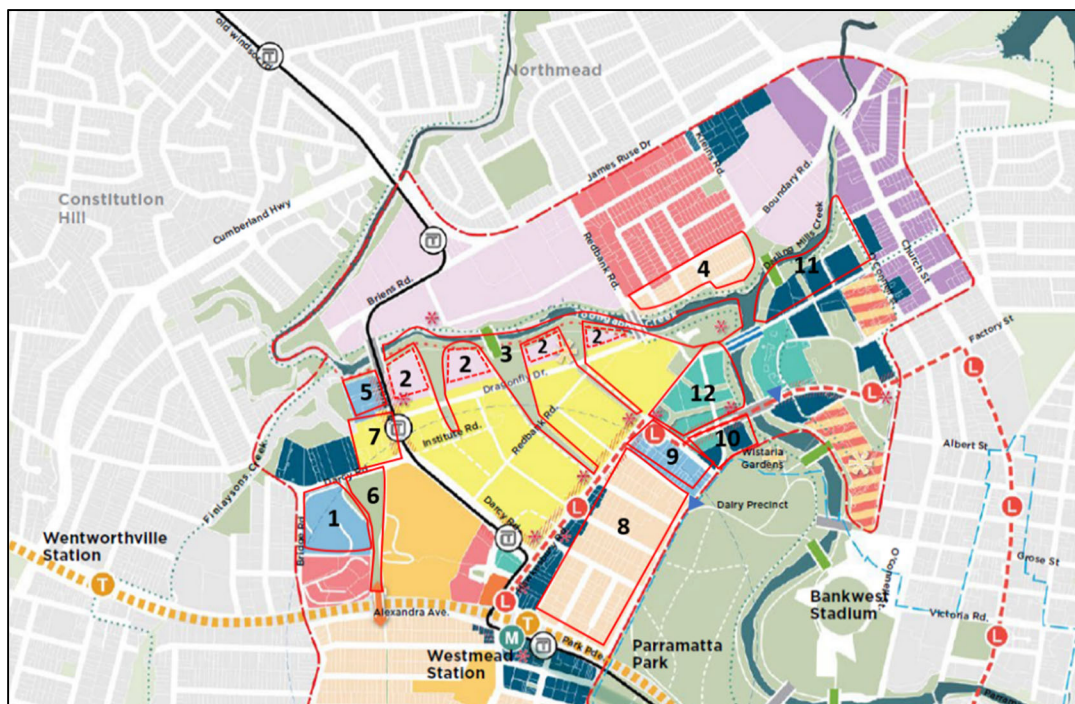


Figure 1: Key changes proposed (Structure Plan, Draft Westmead Place Strategy)

Sub-Precinct 2 – Health and Innovation

Table 1 summarises the key land use planning amendments proposed under the Draft Strategy for Sub-Precinct 2 Health and Innovation.

# (refer Figure 1)	Location	Existing land use zoning (PLEP 2011)	Proposed land use in Draft Structure Plan
1	Corner Bridge & Darcy Roads	SP2 Health Service Facilities (and part B4 mixed use)	Mixed use – health focus
2	North of 'Dragonfly Drive' and southern edge of Toongabbie Creek	SP2 Health Service Facilities	Advanced manufacturing and complementary uses
3	Southern edge of Toongabbie Creek to Hawkesbury Road.	SP2 Health Service Facilities	Open Space
5	Mons and Darcy Road	B4 Mixed Use	Part 'mixed uses (health focus)' and part 'health and research'.
6	Between Darcy Road and Railway line	Part B4 Mixed Use and Part SP2 Health Services Facility	Open Space
7	Corner Bridge and Darcy Roads	SP2 Health Services Facility	Mixed use (health focus)

The proposed land use changes identified on the Structure Plan (refer Areas marked 1, 2, 3, 6 & 7 on Figure 1 and Table 1) within this sub-Precinct suggest an erosion of the SP2 Health Service Facility zoning under the Parramatta LEP 2011. Council is concerned that by reducing the SP2 zone, this will reduce the expansion potential for health services within Westmead. Although it is noted that the proposed land use zones are not specified (consistent with Standard LEP Instrument). Therefore it is not clear what uses are proposed to be permitted within these areas.

Council would support some amendments to the SP2 zoned land in the following circumstances:

- Where it accommodates appropriately planned open space; or
- Where on the periphery of the SP2 zoning supports potential commercial land uses where they support medical and health innovation (e.g. start-ups and research entities) uses.

Council does not support any residential accommodation on SP2 land, with the exception of subsidised key worker housing to support the health precinct, retained in ownership by NSW Health, not strata subdivided and retention of the SP2 zoning on these sites so that if these sites are needed to transition to a different health use they would remain in Government ownership.

The proposed location for 'advanced manufacturing and complementary uses' along the southern side of Toongabbie Creek does not align with the concept of an integrated new urban centre with diverse medical and education uses, active streets, a walkway along Toongabbie Creek and high-density housing. Rather, it could create a 'dead edge' to the creek and open

space both day and night. Any manufacturing associated with medical and health uses should be located within the medical precinct, Northmead Enterprise or employment land on the north side of the creek where there is substantial land and far better access. This desirable area adjacent to the creek and open space should interface with mixed use or high-density employment areas.

The proposed three 'fingers' of open space from the Toongabbie Creek riparian corridor are a poor open space outcome for Westmead and are not supported. Council believes a better outcome is a wider riparian corridor between 20 metre and 40 metres and additional useable open space which can be configured to accommodate a sports field.

In relation to the open space between Darcy Road and the Railway line, it is acknowledged that this follows the creek line. It should be better understood how this may support education and health uses into the future.

Recommendations:

- That further clarification is required as to the proposed 'mixed use' land uses proposed under the Draft Strategy.
- That residential accommodation and tourist and visitor accommodation are not permitted under the final Strategy on existing SP2 zoned land, unless assured that it is for key worker housing which is associated with the health facilities and not strata subdivided and retained in ownership by Health NSW.
- The proposed manufacturing and complementary uses not be located in this area.
- That appropriate quantum and configuration of open space is provided (as detailed in the Section 2.3 below).

Sub-Precinct 3 – Westmead East

Table 2 summarises the key land use planning amendments proposed under the Draft Strategy for Sub-Precinct 3 Westmead East.

# (refer Figure 1)	Location	Existing land use zoning (PLEP 2011)	Proposed land use in Draft Structure Plan
8	Existing residential between Park Parade, Hawkesbury Road and Park Ave	R4 High Density Residential (1.7:1 FSR and 20m HoB)	Opportunity for housing choice and supply
9	Hainsworth Street and Hawkesbury Road	R4 High Density Residential	Mixed Use (health focus)

Table 2: Summary of the key land use change proposed for Sub-Precinct 3

The Westmead East sub-precinct is on the northern slope facing Parramatta Park. The existing residential between Park Parade, Hawkesbury Road and Park Ave (refer '8' on Figure 1) is predominately 3 and 4 storey strata title residential buildings on a fine grain irregular subdivision. The lot depths are about 50 metres and the frontages vary upward from as little as 14 metres. As the subdivision is irregular with many lots small, amalgamation to achieve developable parcels is a significant barrier to redevelopment. Testing undertaken in 2017

indicates that the feasibility of high density residential for Westmead East given the current density, subdivision pattern, location north of Parramatta Park and strata ownership would prove difficult.

It is not clear to what extent there will be an intensification of housing at this location (e.g. density and building height). It is recommended that physical constraints analysis, built form testing and economic feasibility modelling be undertaken to understand the appropriate planning controls (minimum lot sizes, base and incentive FSRs, mixed use areas etc.) that would incentivise opportunities for renewal as well as deliver good urban design outcomes and affordable housing for key workers. Furthermore, Council would want to see a transitioned approach to density in this area, good solar access and a stepping down of height from the transport interchange and Hawkesbury Road to the Parramatta Park edge and consideration of the World Heritage implications on Parramatta Park which is not noted as a consideration.

The current R4 High Density zoned area along Hainsworth Street and Hawkesbury Road (refer '9' on Figure 1) is earmarked in the Draft Structure Plan for 'mixed use (health focus)'. Council supports the interface of this area for health uses, however as the proposed land use zone is not specified (consistent with Standard LEP Instrument), it is not clear what uses are proposed to be permitted and what intensification of density and height will occur. As stated above, further built form testing and economic feasibility would be required at this location to develop appropriate planning controls.

Recommendations:

- That built form and urban design and economic feasibility testing be undertaken to set the appropriate planning controls that would incentivise opportunities for renewal as well as deliver good urban design outcomes.
- The Draft Strategy should explicitly note and consider that any development in sub-Precinct 3 should be in accordance with the Conservation Agreement of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain.

Sub-Precinct 5 – Northmead Residential

The proposed land use amendment in this sub-precinct is the existing residential (zoned R2 Low Density Residential) south of Burlington and Barden Street and north of Toongabbie Creek to be earmarked for 'opportunity for housing choice and supply'.

In principle, Council recognises this area could accommodate some uplift in residential. However it is not clear to what extent there will be an intensification of housing at this location (e.g. density and building height). As recommended above, built form testing and economic feasibility is required to understand the appropriate planning controls (minimum lot sizes, base and incentive FSRs, mixed use areas etc.) that would incentivise opportunities for renewal. Furthermore Council would want to see opportunities for additional widening of the riparian corridor and consideration of the flooding risk, improved active transport links and associated infrastructure will be required.

Sub-Precinct 7 – Parramatta North

Council broadly supports the development of a Draft Strategy to coordinate future vision and land use changes in Parramatta North, however the recognition of its heritage and cultural significance will need to be carefully considered by any final Strategy. Further coordination across key landowners and stakeholders within the sub-Precinct is critical to its successful implementation.

Table 3 summarises the key land use planning amendments proposed under the Draft Strategy for Sub-Precinct 7 Parramatta North.

# (refer Figure 1)	Location	Existing land use zoning (PLEP 2011)	Proposed land use in Draft Structure Plan
10	Between Hainsworth Street and Parramatta River	SP2 Health Services Facility	Part 'Mixed use (health focus)' and part 'mixed use (university and research focus)
11	Deerubbin ALC lands (south of Darling Mills Creek and west of former Parramatta Gaol)	B4 Mixed Use Zone	Opportunity for housing choice and supply
12	Land north of Bridge Road and south of Hawkesbury Road	SP2 Health Services Facility	Mixed Use (university and research focus)

Table 3: Summary of the key land use change proposed for Sub-Precinct 7

State, National and World Heritage Considerations

Both Parramatta North and Parramatta Park are sensitive natural, built and cultural environments compared to other precincts given their heritage listings on State, National and World registers and their significance to the local community and First Nations people.

The Australian Government, New South Wales Government and then-Parramatta City Council signed a Conservation Agreement under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) to protect World and National Heritage values of Old Government House and Domain in relation to its significant views and settings in December 2015. The agreement helps inform planning and decision making, and provides guidance for developers about where new building activity is likely to impact World and National heritage values and how this may be appropriately managed. These views and settings are important in demonstrating the place's role as a centre of colonial administration and contribute to maintaining the integrity of the convict landscape. The Conservation Agreement recognises that development that complies with certain planning controls in Parramatta's identified 'Highly Sensitive Area' will not have a significant impact on the place's listed values. As such, any development that meets these controls, including in relation to height limits, floor space ratios, setbacks, materials and siting, do not need approval under national environment law.

Council believes that 'Parramatta Park' should be included within Sub-Precinct 7 given it is a key asset, a connector between the Parramatta CBD and Westmead and its potential close relationship with this land and the surrounding Westmead precinct. It should be prepared in

coordination with the Parramatta Park Trust and incorporate elements of the Trust's 'Your Parra Park 2030 and be consistent with the Conservation Agreement relating to its World Heritage status.

Furthermore, built heritage identified in Part 4.3.6 and Figure 4.3.6.16 on Built Heritage Significance of the Parramatta Development Control Plan (DCP) 2011 should be retained. The DCP was informed by the Parramatta North Historic Sites Conservation Management Plan (CMP) prepared by Tanner Kibble Denton Architects for Parramatta North. It is recommended that, consistent with Big Move 2 and Direction 9 of the Draft Strategy, that the role of Conservation Agreements and Conservation Management Plans be elevated and considered by any final Strategy.

In addition to the above, Council is concerned about the future of the Former Female Factory site and its management and operation in the developing Westmead Precinct. In order to ensure its heritage value is maintained, Council recommends that the Heritage Precinct containing the Former Female Factory and associated nationally listed items be formally recognised as part of Parramatta Park and be managed by Greater Sydney Parklands (formerly Parramatta Park Trust) in conjunction with the World Heritage Listed Old Government House.

Land Use Considerations

The expansion of university and research uses on both sides of Parramatta River adjacent to Parramatta Light Rail is supported and is considered a better use of this site than the residential proposals previously being pursued by the State Government. Council believes the location of a full-scale university campus at Westmead will support the development of it as a true Innovation District.

It is noted those areas earmarked for opportunity for additional housing are on Deerubbin Aboriginal Land Council (ALC) owned land (adjacent to the former Parramatta Goal) and south of the Parramatta Light Rail line on the western side of the river. However, Council would like a better understanding of the quantum and type of housing proposed. Council would be supportive of any opportunity to provide diversity in dwelling types, such as villas, townhouses, terrace housing and walk-up residential flat buildings in this location.

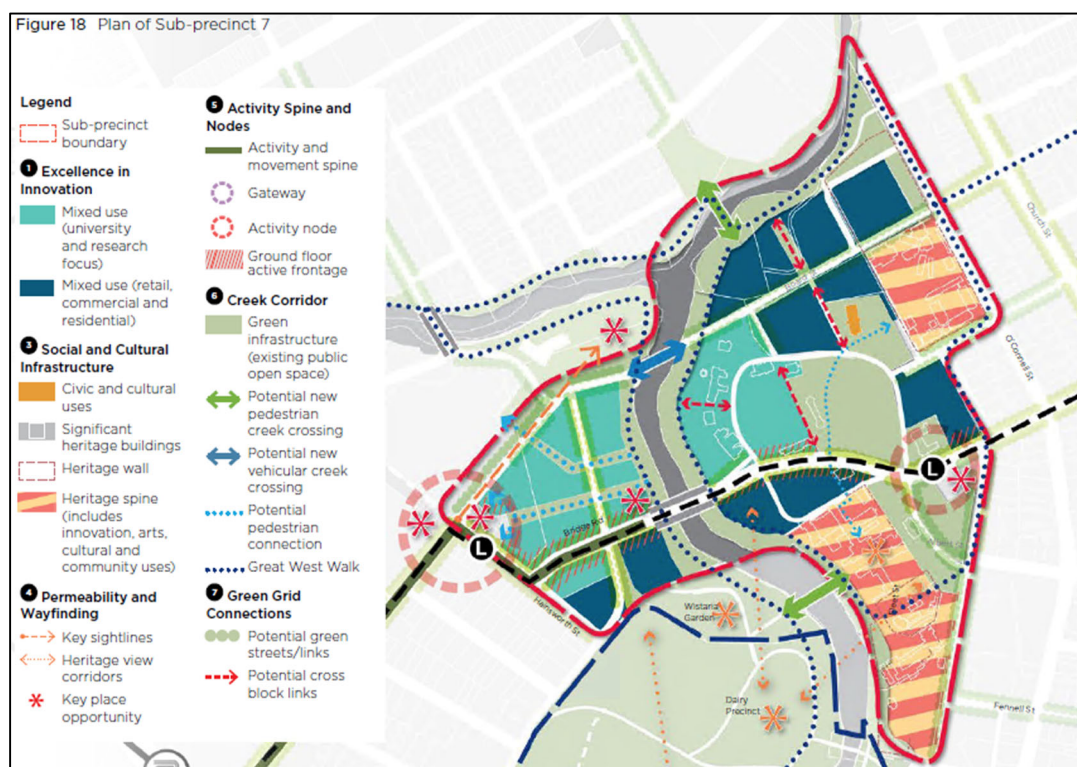
Although the Draft Strategy does not explicitly indicate height and FSR, Council does not support intensification of land use controls (height and FSR) within Sub-Precinct 7, without further in-depth analysis and consultation with landowners and key stakeholders. Any additional housing or non-residential uses should be considered sensitively to the surrounding context. Any concentration of densities which interface to heritage in Parramatta North and Parramatta Park should involve in-depth analysis of built form options based on character, built form and scale, heritage relationships, transport integration and economic feasibility to guide future planning for the area. These factors should be considered to inform the appropriate interface of density to significant heritage areas. It is recommended that the future vision and development for land uses is shown in both plan and elevation view for the whole sub-precinct. Visualisation should be developed to show potential building envelopes, topography, interface of buildings to demonstrate the sensitive nature of the precinct and the significance of its heritage, landscape, topography and setting, particularly for Parramatta North and Parramatta Park.

It should be acknowledged that the Property Section of DPIE is undertaking separate planning work for Parramatta North and that it is recommended that their work is aligned with the finalisation of this Strategy. Further, it is recognised that Parramatta North has a multiple landowners and stakeholders with interests in its future. It is recommended that in line Direction 4 of the Draft Strategy, DPIE Place should collaborate with NSW Treasury, Property NSW, NSW Health, Transport for NSW, University of Sydney, Greater Sydney Commission, City of Parramatta Council, Deerubbin LALC and Dharug to ensure any future planning, prospective development yields or business case by these stakeholders is aligned for sustainable growth and achievable renewal. A governance structure that brings together all levels of government as well as key stakeholders will be critical to maximising the benefits arising from the proposed University campus in this precinct.

Additional comments in relation to Parramatta North include:

Reference in Strategy	Comment
Permeability and Wayfinding & Green Grid	<ul style="list-style-type: none"> • More roads and shared pedestrian/cycleways must be provided by breaking up the block sizes in a way that responds to the site's topography (particularly Cumberland west) and supports low car-dependency (as informed by a future traffic study and public domain plan). • Accessibility improvement for this space is supported. However, there are historic 'ha-has' (i.e. a recessed landscape feature) and a native flying fox colony along the eastern embankment. Celebrating these features along the river should be sensitively addressed. • Green grid corridors between PNUT and Parramatta Park must be strengthened to activate the site and support potential additional densities through additional bridges across the Parramatta River and Darling Mills Creek to Northmead. The confluence of these waterways is a significant natural characteristic of the site.
Figure 18 Plan of Sub-precinct 7	<ul style="list-style-type: none"> • Asterisks for Key Place Opportunity and Heritage Destinations (refer Figure 2 below) - Further clarification on these markings is required. Do these asterisks represent new 'tall and slender buildings'? Important uses? The interface of old and new buildings/uses should be carefully considered so they do not detract from the existing heritage and unique precinct character that should be celebrated throughout sub-precinct 7. • Green and blue arrows labelled as 'potential; river crossings' (refer Figure 2 below) – more certainty on the delivery of crossings for pedestrians/cycleways and vehicles must be provided, and be inclusive to cyclists and universal access – particularly given the strong relationship with health and the hospital uses (as well as future university). • The current B4 zoning under PLEP 2011 applies south of the light rail stop and along the extension of Factory Street (west of Fleet Street) is not reflected in Figure 18 (refer Figure 2 below) as blue mixed use (retail, commercial and residential).

Figure 2 Plan of Sub-Precinct 7



Sub-Precinct 7 Recommendations:

- The Draft Strategy should explicitly note and consider that any development in sub-Precinct 7 should be in accordance with the Conservation Agreement of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain and Parramatta North Historic Sites Conservation Management Plans.
- In relation to Parramatta North, the Strategy should recognise that DPIE Place should collaborate with NSW Treasury, Property & Development NSW, NSW Health, Transport for NSW, University of Sydney, Greater Sydney Commission, City of Parramatta Council, Deerubbin LALC and Dharug to ensure any future planning, prospective development yields or business case by these stakeholders is aligned for sustainable growth and achievable renewal. The “City Deal”, which is also discussed and supported later in this submission, is a key part of this process.
- The planning for Sub-Precinct 7 in the final Strategy, should demonstrate in-depth analysis of built form options based on character, built form and scale, heritage

relationships, transport integration and economic feasibility to guide future planning for the area.

- The Heritage Precinct containing the Former Female Factory and associated nationally listed items should be formally recognised as part of Parramatta Park and be managed by Greater Sydney Parklands (formerly Parramatta Park Trust) in conjunction with the World Heritage Listed Old Government House.

2.1.5 Outstanding Technical Work Required

Council is concerned that the Department, Greater Sydney Commission, Westmead Alliance, Council and other stakeholders have undertaken over the last 5 years significant level of technical analysis within the Precinct that is not acknowledged by the Draft Strategy.

Council is aware that the following technical studies DPIE were undertaken for Westmead South and Wentworthville:

- contamination,
- flooding and stormwater,
- utilities and servicing,
- market feasibility,
- sustainability analysis,
- Aboriginal archaeological assessment,
- community needs assessment,
- ecological assessment;
- urban design framework study; and
- a scoping report for a comprehensive traffic and transport study.

Furthermore, Council as part of the Alliance's Westmead Masterplan work have undertaken the following:

- community infrastructure strategy;
- infrastructure assessment;
- economic analysis; and
- sustainability assessment.

Therefore, it is recommended that DPIE acknowledge the technical work undertaken to date and undertaken a gap analysis to understand where further analysis work is required. It is recommended that a comprehensive traffic and transport study is essential for understanding and effectively planning the Westmead precinct as detailed Section 3 below.

The technical work is required to understand the carrying capacity of the precinct, realise high quality urban design and place-based outcomes and to undertake the appropriate infrastructure planning. Unintended adverse consequences may result from identifying planning controls prior to comprehensive studies being completed, include setting unrealistically landowner expectations (speculation), losing the potential for early land acquisitions and / or reservations required for infrastructure delivery and appropriately costing and planning infrastructure with stakeholders.

Furthermore the land uses and built form within a final Strategy should be informed by this detailed work and be aligned to the current planning framework in order to be legible and inform future Planning Proposals.

Recommendations:

- That the Strategy be amended to recognise and utilise the previous work undertaken by DPIE, GSC and the Westmead Alliance, in order for the Strategy to be finalised and be reformulated into an Action Plan.
- That the existing technical studies already undertaken for the precinct be synthesized and the infrastructure needs of the Precinct be defined and local and state infrastructure identified and costed and funding sources be identified. That the key next step should be the transport capacity analysis to validate the built form and urban design analysis and economic feasibility work already undertaken.
- Prior to implementation that the draft Strategy identify land uses (aligned with the Standard Instrument definitions) and include overarching job and dwelling numbers in line with current strategic plans and informed by key studies (traffic, flooding, social infrastructure assessment).

2.1.6 Planning Proposals and State Significant Development

It is recognised that the Draft Strategy intends that future Planning Proposals, via a Ministerial Direction to be consistent with the final Place Strategy, including proposed change of land uses and planning controls (density and height). City of Parramatta Council currently has two site-specific planning proposals that sit within the draft Westmead Place Strategy boundary:

- 93 Bridge Road Planning Proposal is seeking to increase the floor space ratio and the height of buildings control for the purposes of residential accommodation and hotel and motel accommodation and serviced apartments.
- 12A Mons Road Planning Proposal is seeking to facilitate the Westmead Private Hospital 'Stage 4' redevelopment by increasing the floor space ratio control and height of buildings.

The full details of these Planning Proposals are found at **Appendix B**.

In relation to the Bridge Road Planning Proposal, Council is concerned that specifically in relation to residential development Council may set undesirable precedent for amendments to land use and density and height controls that would then be perceived by other landowners as the benchmark for density that cannot be supported on built form and traffic grounds.

Although the Draft Strategy sets out a structure for Westmead, it will ultimately be for Council to undertake the more detailed planning work to continue to progress this planning proposal and amend the Parramatta LEP 2011.

In relation to the Westmead Private Hospital Planning Proposal, both the Metropolitan Plan and Central City District Plan, and the Draft Strategy envisages Westmead as a thriving precinct centred on innovation, health and education. This Planning Proposal seeks to facilitate the expansion of Westmead Private Hospital which aligns with the vision of creating additional jobs in the Westmead Precinct. Given the strategic alignment of the proposal, the assessment of this site-specific Planning Proposal should proceed, subject to additional urban design (which will inform a site specific DCP), flooding (to satisfy Ministerial Direction) and on site traffic analysis and the inclusion of a provision that does not allow for any additional residential density on the site.

Furthermore that State Significant Development (SSD) application process, which is overseen by the Department, will also be another mechanism to approve development that delivers additional housing and employment. As outlined above, without the appropriate technical work and infrastructure planning in place, Council believes it is premature for any Planning Proposal or SSD applications to be lodged and progressed for any use other than health facilities that provide a direct service to the community which should be the highest priority for this precinct.

Recommendation:

- Following the lodgment of this submission Council will consider a more detailed report on how future Planning Proposals might be managed between now and implementation of the Strategy and what position Council should take on whether Development Applications, including significant State Significant Development Applications, should progress ahead of the implementation of any Strategy.

2.2 Traffic and Transport

2.2.1 Traffic and Transport in Westmead

A key action (D2.A5) of the Draft Strategy is to “prepare a place based integrated transport and traffic study to support future rezonings.” The traffic impacts of the precinct are critical to understand. A comprehensive traffic and transport study is required that considers the cumulative impact of growth and the broader population increases projected for the wider GPOP area. Council strongly recommends that these investigations, including modelling and analysis of current and future traffic flows, should be developed prior to the finalisation of the Strategy rather than after the fact.

Council appreciates that public transport, walking and cycling will play increasingly important roles in the Precinct. However, Council is also very mindful of the pressing traffic problems which are happening today in Westmead, including the large traffic queues forming daily in the Precinct and issues with pedestrian safety especially those associated with the existing Catholic school. The private car is the dominant mode of travel to work in the Northmead portion of the study area. Census 2016 Journey to Work data for Northmead indicates 69% travel to work by car vs 14% using public transport. Council acknowledges that public and active transport usage will have to grow over time to support growth in Westmead, however this will not change overnight, and private cars are likely to carry a significant portion of travel to Westmead for at least the next 5 to 15 years. It should be noted that shifting travel patterns and increasing public transport mode share will always be challenging due to high numbers of shift workers and the catchment of health workers, researchers and patients.

Council welcomes the inclusion of Objective 3 to “Improve (the) road network to increase connectivity and effective movement of vehicles” in Direction 1 “Evolve Westmead to be a truly connected 30-minute city by leveraging new transport connections and improving existing networks within the Precinct, GPOP and neighbouring centres”. However, it is unclear from the current draft Strategy where these improvements will be located and associated land acquisition to realise these improvements.

Additionally, planning for Westmead should include a view of the important health services delivered in the Precinct and the need for accessibility by all modes including cars for emergencies, visitation and attendance of appointments. With this in mind, Big Move #5, to “Capitalise on transport connectivity and reduce car dependency” should be amended to include an acknowledgment that motor vehicles provide important access to the Precinct and opportunities to reduce congestion and increase the efficient movement of all users should include targeted improvements to the road network.

It is important that land use be calibrated to the transport capacity of the precinct. As transport improvements come on board (notable to commencement of operations of the Parramatta Light Rail and West Metro services), the intensification of land uses, in particular residential uses, should be timed so there is available transport capacity. Otherwise there is a real risk that congestion from these less critical uses in the precinct will impact on the operation of key health services and other support activities that are much more important economic drivers for the precinct and the region.

Further, it is recognised that in and around the many educational facilities and schools in Westmead cause traffic management challenges at drop off and pick up times traffic. It is recommended that appropriate management solutions, for example drop off points, are considered as part of the traffic and transport work.

Recommendation:

- That prior to implementation of a Strategy for Westmead that a comprehensive traffic and transport study is undertaken which considers the cumulative impact of growth and the broader population increases projected for the wider GPOP area. The study should include modelling and analysis of current and future traffic flows.
- That appropriate traffic management solutions for schools in Westmead are considered as part of the traffic and transport work.

2.2.2 Active Transport

Council have reviewed the Structure Plan and associated Sub-Precinct Plans and request that any final Westmead Place Strategy update these Plans to reflect Parramatta Bike Plan (CoP, 2017), Parramatta Ways Walking Strategy (CoP, 2017) and Mays Hill Masterplan (Parramatta Park Trust 2017) relating to active transport and as outlined in detail in

Appendix C.

Recommendations

- That the Westmead Place Strategy maps be updated to include missing information relating to active transport as detailed in Appendix C of this submission.

2.2.3 Street Patterns and Movement

Success of Westmead as an Innovation District with a strong economy and reduced car dependency will depend on the Precinct being integrated into the overall urban fabric, not only by being a destination. Such integration requires the extension of streets into and through the Precinct. The ability of the Precinct to deliver the vision and optimise the

opportunities of the infrastructure (public transport) will depend on maximising external connections and delivering fine grain internal streets and blocks.

To achieve this connectivity and integration the following key considerations will be:

- New external connections are essential for both vehicles and pedestrians across Toongabbie Creek to the north and west, under the rail to the south, and for pedestrians (and cyclists) through Parramatta Park to Parramatta.
- Hawkesbury Road should be extended to the north and be integrated with the existing and proposed street network as a key connecting spine between North and South Westmead. Consideration should also be given to the possibility of a light rail extension south of the railway.
- Pedestrian access across Darcy Road should be considered which would enable people to more easily come to and from the transport hub to the hospital.
- Access or new streets to the open space and riparian corridor along Toongabbie Creek.
- New streets within proposed university use land should relate to the adjacent street network and provide opportunities for views and links to Parramatta North.
- Universal access across the precinct is a key issue and particularly for a health precinct.

It is critical that these connections and links be considered in the early stages of precinct planning, as they may require land reservations (due to land ownership) and additional costs (due to topography, creeks and rivers etc) and to be delivered in line with development. Therefore it is recommended that the traffic and transport study identify these critical connections within the Precinct.

Recommendation:

- That the traffic and transport study identify critical new connections for within the precinct.
- That a pedestrian movement analysis be undertaken to understand the best location for different activities to make them successful (including their economic success) and highlight issues and propose solutions in relation to connectivity and capacity of the streets.

2.3 Open Space

2.3.1 Overall Provision of Open Space

The Draft Strategy does not propose sufficient or well-designed open space to support workers, students and residents currently or in the future.

One of the most significant differences between the previous work undertaken by the Westmead Alliance's draft Westmead Innovation District Masterplan (WIDMP) and the draft Strategy is in the proposed network of open space. During the preparation of the draft WIDMP, Council and NSW Health researched global examples of successful innovation districts, and one of the success factors for these places was their provision of high quality public open space and amenity. The significant lack of high quality open space provision within the precinct was noted. While the obvious significant provision of open space in the adjacent Parramatta

Park needs to be acknowledged, there are a couple of key reasons why this does not negate the need to address this issue in the master planning for Westmead:

1. Parramatta Park is constrained in how it can be used and activated due to the significant heritage considerations that apply there and sits on the edge of the precinct some distance from the hospitals. Appropriate space in and around these key health facilities easily accessed by patients, workers and visitors is critical;
2. Westmead Precinct has particularly low provision of public open space at present; and
3. The significantly increased intensity of use planned for Westmead due to an increase in residents, workers and students highlights the need to make the place itself inviting and enjoyable to be in, and one of the key ways to achieve this is through provision of high quality amenity and open space.

The draft Strategy's Big Moves include the intention to provide "exceptional places" (Big Move #2) as well as ensuring there are "vibrant, diverse and well-connected public spaces and places."

Under Direction 7 (D7.P2) of the Draft Strategy there is a planning priority that includes delivery of more parks. Associated Actions D10.A1 and D10.A2 also propose to plan and improve existing parks and potentially create new "open spaces, parks [and] playgrounds." These actions are supported, noting their responsibility sits with councils, DPIE, other state agencies and stakeholders.

Council is concerned that the resultant actions are to undertaken further studies that fall to the responsibility of Council. City of Parramatta has already completed such studies and it is recommended that DPIE draw on this technical work to inform future open space provision. Council has an adopted Community Infrastructure Strategy (CoP 2020) that identifies the need for open space across City of Parramatta, and the draft WIDMP sets out a network of open space designed to address existing and future open space shortfalls. Further Council is aware of similar work commissioned by DPIE from Cred Consulting who produced a report addressing social infrastructure needs in the Cumberland LGA part of Westmead.

Councils' Community Infrastructure Strategy 2020 (CIS) has identified a lack of active and passive open space and recreational facilities in Westmead and the surrounding area, with existing facilities experiencing increasing demand due to high levels of current and forecast population growth associated with increasing residential densities. Existing Council facilities are unlikely to be able to accommodate any additional demand created by an increased population or increased visitation by primary, secondary and tertiary students and workers.

2.3.2 Open Space priorities for Westmead

Council's Community Infrastructure Strategy identifies the key priorities for Westmead in terms of open space:

- **One new district play space.** There are currently no pocket, local or district play spaces in the suburb.
- **One new sports field.** Westmead currently contains no sports fields, although some exist in the neighbouring suburbs of Northmead and Toongabbie.

- **One new district park.** Westmead has no district parks. This park could be developed close to the required sports field, to the benefit of workers, residents and visitors

The draft Westmead Innovation District Masterplan, produced by the Westmead Alliance in April 2019, identifies a far more generous network of open space to address the need. Figure 3 indicates Council's preferred open space network).



Figure 3: Councils recommended open space location along the riparian corridor.

Finally, Catholic Education has a current state significant development application in with DPIE (reference SSD 10383) that would significantly intensify the educational and other uses on this site, while at the same time significantly decreasing the amount of sporting open space that they currently provide on their site. While the sporting space is currently not available for public use outside of school hours, Council is hopeful that agreement can be reached with Catholic Education to amend this.

Recommendations:

- That the technical assessment in relation to open space and recreation undertaken to date by both the Westmead Alliance, City of Parramatta and DPIE be drawn on to better inform the final Strategy.
- That prior to finalisation the Strategy identify associated land for dedicated open space, in accordance with Figure 3 which includes:
 - The NSW Government-owned land be increased to the size to accommodate a sports field; and
 - The riparian zone identified in Figure 3 be increased to have a minimum set-back of 20 metres to 40 metres along all banks of Toongabbie Creek, Parramatta River and Duck Creek.
- That the Strategy provides associated funding to ensure that adequate open space is delivered.

2.4 Community Infrastructure

2.4.1 The need for Community Infrastructure

The need to support growth of residents workers and visitors to the precinct is discussed in detail previously in this submission. Council's Community Infrastructure Strategy 2020 identifies the following key recommendations for community infrastructure to support the projected population growth in Westmead:

- **Deliver a community hub** of a minimum of 3,000m² as part of the Westmead Master Plan.
- **Deliver between approximately 500m² and 1,000m² of subsidised space** in Westmead, ideally located with a new community hub.
- **Deliver a new indoor recreation facility** of at least four multipurpose court capacity, close to areas of high-density dwelling growth and public transport.
- **Advocate for long day care centres** to provide at least 691 additional places (with additional places for workers) by 2041 within the Westmead Innovation District, with a mix of private and not-for-profit owned and operated centres.
- **Advocate and plan for the provision of affordable rental housing** for key workers, students and those requiring short-term stays.

The draft Westmead Place Strategy includes Direction 7 which encompasses actions in relation to community facilities and social infrastructure. The actions included in the draft Place Strategy do not acknowledge the work that Council has already completed. Action D7.A1 (preparation of an open space and social infrastructure needs assessment), for example, has been completed by Council. It is also Council's understanding that similar work was commissioned by DPIE for the Cumberland Council portion of the suburb during its planning for the Westmead South Precinct. These recommendations are based on the nature of change envisaged in Westmead through the work completed to prepare the draft WIDMP, as well as dwelling and population growth forecasts as identified by Council's endorsed Local Housing Strategy and Local Strategic Planning Statement (2020).

Recommendation:

- That Action D7.A1 be removed with the acknowledgement that this work has already been completed by City of Parramatta Council. It should be replaced with the following action, with "Councils" remaining the responsible authorities:
 - "Implement the Westmead recommendations in City of Parramatta's Community Infrastructure Strategy 2020 and the Department-commissioned community infrastructure needs assessment for Westmead South."
- That the preferred location for key community infrastructure be identified in the final Westmead Place Strategy, noting the priorities for placement of community infrastructure in City of Parramatta's Community Infrastructure Strategy.

2.4.2 Provision of Child Care

Based on a study² commissioned by Council there is likely to be undersupply of 105 long day care places for residents in Westmead by 2036. It is worth noting that this study did not anticipate the potential population growth from the development of the southern half of Westmead in the Cumberland local government area.

Council does not currently own or operate any childcare centres in Westmead. The closest Council-operated centre to Westmead is located on Redbank Road in the neighbouring suburb of Northmead.

The draft Place Strategy does not specifically mention or consider childcare needs, but it is assumed that Actions D7.A1, D7.A3 and D7.A4 would include consideration of childcare facilities in their broader consideration of planning for social infrastructure. Council recommends naming childcare in these actions, as it is a critical component of community infrastructure that also supports not only the resident population, but jobs growth and productivity.

Recommendations:

- That Direction 7 and associated actions of the draft Strategy be updated to include the need for childcare services.

2.4.3 Affordable Housing

Although affordable housing does feature in 'Direction 8 – Housing Our City' in the Draft Strategy, the actions make it clear that no further work has been done to realise this. Instead, the actions under this Direction task Councils with undertaking studies to assess the possibility of delivering "key worker, social and affordable housing."³

Council supports the action to investigate further delivery mechanisms for affordable/key worker housing (as it is consistent with City of Parramatta's Affordable Rental Housing Policy 2019)⁴, however, planning and delivery of additional social housing is the responsibility of the NSW Government and as such, this work should be allocated to the Land and Housing Corporation (LAHC).

The draft WIDMP Identifies specific locations where potential affordable/key worker housing could be located in Westmead North, including a site on NSW Health-owned land. This matter was discussed with NSW Health at length in preparation of the draft WIDMP and was agreed with Council for two reasons:

1. In the short to medium term, developing State-owned affordable housing at the current Nurse's Quarters site would allow an increase in housing for key workers to support the operation of the Westmead Health precinct; and
2. In the longer term, developing this land while ensuring NSW Health retained ownership (rather than simply developing it as strata housing and selling part of it) ensures that the land could be used for other purposes as the needs of the Precinct change in future.

² *Early Education and Care Services Needs Analysis* completed by Families at Work (2015)

³ Pages 39 and 72 of the draft Westmead Place Strategy outline actions in relation to affordable and other subsidies housing, allocating responsibility solely with councils.

⁴ <https://www.cityofparramatta.nsw.gov.au/sites/council/files/inline-files/Affordable%20Rental%20Housing%20Policy.pdf>

The draft WIDMP also identified targets of 10% of housing as affordable housing, and 30% of housing developed on publicly owned land as affordable.⁵

Recommendations:

- That Direction 8 of the draft WPS be revised to allocate responsibility for the investigation and development of social housing to the Land and Housing Corporation (LAHC).
- That the WPS sets affordable housing targets associated with provision of a percentage of the uplift value within new developments in Westmead, being 10%, to align with actions in the *Plan for Growing Sydney*.

2.4.4 Schools

Council's current engagement with Department of Education indicates that the current Westmead South Primary School is operating above capacity and that there may be new schools being planned for Westmead. Council is concerned that this amounts to a lack of integrated planning for Westmead and urges DPIE to correct this.

The Structure Plan on page 15 of the draft Strategy indicates where existing schools are in the Westmead precinct, which does not align with a more detailed plan for social infrastructure that appears on page 36. Therefore the draft Strategy does not demonstrate the need for new schools or expansion of existing schools and no new or expanded school sites.

The draft Strategy does not distinguish between separate primary and secondary schools. This is important as primary and secondary schools create very different potential impacts for the road and pedestrian and cycling networks. The existing school network is already a significant contributor to peak morning and afternoon traffic congestion.

Given that the bulk of population increase appears to be planned for the southern half of Westmead, it would follow that this is the ideal location for new primary and secondary schools to be located to address this increased demand for such facilities.

Recommendation:

- That DPIE engage with the NSW Department of Education to correctly identify the sites for new and expansion of existing schools in Westmead to accommodate the increase in residential population as part of the Draft Strategy.
- That new Primary and Secondary schools be located in Westmead South (Cumberland Council), rather than Westmead North (City of Parramatta) due to the location of planned residential development as well as the existing transport network constraints experienced in this part of Westmead.

2.5 Economic Development and Smart Cities

2.5.1 Economic Development

⁵ Page 72 pf the draft WIDMP identifies these affordable housing targets, which at the time of writing, were consistent with the draft Affordable Housing Policy that was publicly exhibited by City of Parramatta Council.

Council supports the recognition of the draft Strategy of the potential for Westmead to deliver an 'economic powerhouse' for Western Sydney and Australia.

Preparation of an economic development strategy is strongly supported, and should involve active collaboration with Council, as it should form the basis of the commercial, industrial and mixed-use land uses within the structure plan, and inform successful prospecting activity by all forms of government.

Council requests that any technical inputs and assumptions used to underpin the draft Strategy including population growth, economic forecasting, any future floor space requirements for anticipated sector growth and development, economic modelling, ownership and urban design analysis should be shared with Council.

Further detail is required on how the Strategy intends to "target night-time activities" and "support day and night activities" and how this could be achieved. Council would welcome the opportunity to work with stakeholders on the night-time economy vision and strategy for Westmead.

There does not appear to be any areas planned for "arts, civic or cultural facilities" in the entire north section of Westmead, and only one in the southern precinct. This would likely be underservicing the needs of the population and under delivering on many of the outcomes identified in the draft Strategy.

Direction 4 of the Draft Strategy states *"Foster a strong collaborative relationship and pride between government, local community, industry and investors to collectively deliver the Westmead Vision"*. Council recommends that a corresponding action should be included to establish a strategic partnership, collaboration and commitment to advance the long-term strategic and economic impacts of the Westmead Precinct. Council considers that in order for Westmead to succeed, it is imperative that we align Federal, State and Local government interests and commitments in this significant precinct. These three levels of government should agree on their respective roles and responsibilities and work together to identify shared delivery of elements like transport, access, industry support and amenity improvements. A 'City Deal' style agreement, would help maximise impact of government investment in Westmead, attract private investment and improve the physical nature of how the Precinct operates within the medical core, the City of Parramatta and the region.

Council notes the intention to develop a Place Brand Strategy for Westmead. While this is supported, this Place Brand Strategy should include consideration of tourism opportunities for Westmead, including heritage-based tourism and medical tourism.

Recommendations:

- That the Westmead Place Strategy be the basis upon which a 'City Deal' for Westmead is negotiated to deliver the critical supporting infrastructure required to realise the vision for Westmead as an Innovation District.
- That the draft Strategy proposed land uses changes that realise the future economic activity within the Precinct are underpinned by the appropriate technical analyses.
- Amend Action D9.A1 to include investigation of additional tourism opportunities, including heritage-based tourism and medical tourism for Westmead.

2.5.2 Smart City Initiatives

The draft Strategy includes the intention to “advance a smart city strategy for Westmead” (Point 6 under Big Move #1). Westmead is part of Greater Parramatta, and any proposed smart city strategy for Westmead must be linked to the Greater Parramatta Smart Cities Plan, which is due to be delivered in 2020-21 as part of the NSW Smart Places Strategy.

Recommendations:

- That Objective 1, Actions D3.A1, D3.A2 be amended to link to the Greater Parramatta Smart Cities Plan, which is due to be delivered in 2020-21 as part of the NSW Smart Places Strategy.
- Amend planning priority D3.P1 be amended to reflect “other smart infrastructure and technology” (not just transport communication and energy efficiency) that have the capacity to improve the performance, productivity and experience of Westmead.
- Amend Action D7.A5 –smart city infrastructure should be planned and integrated in any public domain plan for Hawkesbury Road.
- Propose a new Action which requires standards that the smart city infrastructure would either integrate seamlessly with current systems operating within the Greater Parramatta to Olympic Peninsula area, or be viable to be rolled out across the Greater Parramatta to Olympic Peninsula area.
- Proposed new Action to implement the monitoring of waste production, water and energy use through smart infrastructure in real time, over time, which will inform the effectiveness of the initiatives delivered under D11.A2.

2.6 Sustainability, Green Grid Network, & Flooding

2.6.1 Sustainability

Sustainability is identified in Draft Place Strategy, however is not sufficiently reflected in the Strategy’s big moves, planning priorities and actions and as such the following comments made in respect of Directions 10 to 12.

Direction 10 “A City in its Landscape” of the Draft Strategy includes an associated planning Priority (D10.P5) to address water quality improvements to make Parramatta swimmable by 2025. Council recommends this include an associated action to ensuring treatment of stormwater runoff from the precinct and reducing sewer overflows.

Direction 10 should include a priority and action to recognise and address local biodiversity protection and enhancements, especially along the River and surrounding corridor links to core flora and fauna habitat.

Direction 11: “An Efficient City” does not set performance requirements related to energy, water or waste for the Precinct, especially given the significant energy and water demands and infrastructure requirements that will be required. It is recommended that:

- Targets to be set to align with relevant NSW Government agencies and Council strategies and targets, e.g. net zero energy by 2050, recycled water provision (Sydney Water) etc.

- Maximising onsite renewable energy generation and storage, and energy efficient design and are key priorities to reduce emissions and operating costs for the Precinct.
- Efficiency City initiatives should be specified to ensure that they are able to be incorporated early in planning and development requirements across the Precinct, e.g. centralised energy, water and waste facilities, recycled water, electric vehicles.

Direction 12: “A resilient city” should address urban heat and heatwave planning and design. A range of specific responses would include; built form requirements, reducing anthropogenic heat sources, cooling through irrigation, materials, greening and shade.

Recommendations:

- That Direction 10 “A city in landscape” shall contain additional actions that directly improve Parramatta River water quality and recognise and address local biodiversity protection and enhancements.
- That Direction 11 “An efficient city” include and align energy and water targets with NSW Government strategies and associated targets and opportunities are identified in early planning for supporting energy and water infrastructure.
- That Direction 12: “A resilient city” include planning priorities and actions relating to urban heat.

2.6.2 Green Grid - The Parramatta River and Toongabbie Creek Corridors

Council welcomes the integration of the Central West District Plan priority Sydney Green Grid corridors as a key component of the Draft Strategy. Council has also identified the development of these corridors as a priority policy direction under Council’s LSPS (Policy Direction 36). Council is currently undertaking work on identifying the needs and opportunities associated with these corridors and this work could greatly benefit from the refinement of the vision set out by the Draft Strategy.

The current state of the corridors and the interface of development with the river and other waterways within Westmead is currently quite poor. To re-establish the priority of the corridors is a challenge that will require strong leadership and direction from all stakeholders.

It is noted that the extent of Green Grid corridors affected by the Draft Strategy are particularly important within the context of the broader regional network and the development of ‘Greater Parramatta.’ Connections in Westmead provide an opportunity to link Wentworthville to Parramatta CBD through a continuous open space corridor, adding over 5km to the existing Parramatta River Valley network.

A stronger spatial arrangement for the Toongabbie Creek, Darling Mills Creek and Parramatta River corridors needs to be illustrated and communicated in the strategy’s structure plan, currently Council’s is concerned that the Structure Plan:

- does not have the same level of design resolution as development and the street network;
- de-prioritise the public relationship with the waterways;
- illustrate encroachment of development onto riparian, flooding and wetland zones;

- have limited potential as functional open space due to the size, shape and topographic constraints; and
- will limit the opportunity for these green grid corridors to deliver on many of the principles identified within the Westmead Place Strategy.

It is critical that a stronger representation of what is needed to establish a regional open space corridor is identified at a visioning stage. In particular, the design and arrangement of the corridor's open space should have a greater influence on the arrangement of development and street alignments within the structure plan.

Recommendations

- That Council and DPIE work closely together to establish and refine the Green Grid Network for the Westmead Precinct, and this work aligns with the recommended principles and further consideration contained in **Appendix D** of this submission.

2.6.3 Flooding

Based on available information, the proposed planning precinct is impacted by both mainstream flooding and overland flooding. Some land use changes are proposed within high, medium and low hazard areas. Whilst detailed information on mainstream flooding is available, there is very limited overland flooding information available. The proposed precinct area will be impacted by overland flooding and hence integrated flood investigation (mainstream and urban flooding) should be undertaken to better inform and progress the Draft Strategy.

Council is aware that a Flooding and Stormwater Study for Wentworthville was prepared by AECOM on behalf of DPIE, Stage 1 (August 2018) which is based on available flood studies and information. It also recommends further investigation on overland flood studies to fill gap in flood information and mentions that will be undertaken as part of stage 2.

As detailed in Flooding and Stormwater Study, Stage 1 prepared by AECOM, opportunity to naturalise Coopers Creek and Finlaysons Creek, maintaining overland flow paths, alleviation of existing flooding issues and improving stormwater quality with integration of water sensitive urban design (WSUD) elements should be utilised.

The further investigation regarding overland flooding, risk assessment, capacity of existing stormwater drainage network, upgrade requirements to existing stormwater drainage system should include:

- For detail land use zoning, impact analysis (pre-development and post development) risk assessment should be undertaken including sensitivity analysis with climate change as per *Australian Rainfall and Runoff Guideline 2019 (ARR2019)*.
- Existing stormwater drainage capacity should be investigated and upgrade requirements for proposed zoning should be identified.
- Opportunities to naturalise Coopers Creek and Finlaysons Creek, maintaining overland flow paths, alleviation of existing flooding issues and improving stormwater quality with integration of WSUD elements should be utilised.

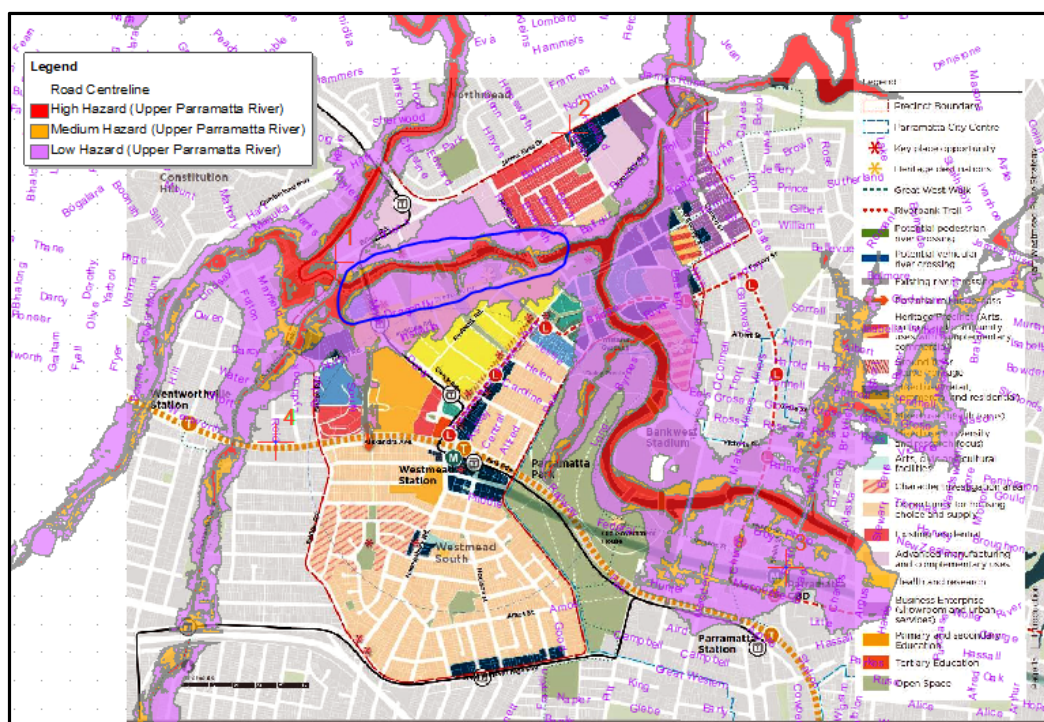


Figure 4: Structure Plan overlaid with Flood Hazard Map (Source: Upper Parramatta River Flood Study, Upper Parramatta River Catchment Trust)

The Precinct contains high, medium and low risk flood areas (as show in Figure 4 above). The area circled in blue denotes an example of where land use change is proposed to occur under the Draft Strategy and the need to properly assess the flooding impact. It is noted that the Figure 4 above only shows mainstream flooding due to limited availability of overland flooding information.

Council is currently undertaking a Parramatta River Flood Study including tributaries and overland flooding. Flood modelling work is in nearly completion stage and is expected to go on public exhibition by the end of 2021. This may assist in understanding existing flooding issues when available. However, as part of this precinct planning work a detail impact analysis including sensitivity of climate change needs to be undertaken.

Recommendation:

- Further technical investigation regarding overland flooding, risk assessment, capacity of existing stormwater drainage network, upgrade requirements to existing stormwater drainage system to accommodate the proposed Westmead Place Strategy including details of planning elements will be required for further assessment.

2.7 Heritage

2.7.1 Relocation of Willow Grove to Sub-Precinct 7

The Draft Strategy supports “the relocation of Willow Grove to the Parramatta North sub-precinct, outside the heritage core, ensuring its future uses and siting integrates with surrounds. Willow Grove reconstruction will be subject to planning approvals.” (refer Planning Property D9.P7, pg41).

Council notes that on the 11 February 2021, the Minister for Planning and Public Spaces granted consent for the Powerhouse Parramatta development including the retention of St Georges Terraces and the relocation of Willow Grove. Relating to Willow Grove’s relocation, there are two conditions of the consent (reference Conditions B1 and B2) and described briefly as follows:

- B1 requires photographic archive recording of Willow Grove (including the Phillip St front fence) and a copy of which shall be provided to Council; and
- B2 requires that prior to the deconstruction of Willow Grove that a Relocation Framework and Methodology Plan be prepared that outlines the site selection process, development approvals pathways and consultation that will be undertaken to determine a new site for Willow Grove. It also requires detailed engineering and heritage assessments and engagement of an expert to oversee the process.

As the approval has been granted for the relocation of Willow Grove, and in accordance with Council’s position on the matter (as detailed in **Appendix F**), Council awaits further detail on the proposed method, future location and impact on the impact of the heritage significance of Willow Grove to allow for full assessment. Therefore it is considered premature for the Draft Strategy to identify Parramatta North as the location for Willow Grove at this stage.

Recommendations:

- Council seeks further detail on the proposed method of relocation, future location and impact of the heritage significance of Willow Grove to allow for an assessment of the proposed relocation.
- Further that the Draft Strategy awaits the proper site selection assessment process to be carried out as part of the Powerhouse approval, prior to identifying Parramatta North as the final location for Willow Grove.

2.7.2 Aboriginal and Cultural Heritage

Parramatta LGA is significantly under-served by the available cultural facilities compared to cities of similar demographic and size. Many types of cultural infrastructure are already recognised in policies and plans led by Council and State Government as arts and culture are central to what makes a city appealing to talented workforces and engaged communities

Council’s Cultural Infrastructure Strategy identifies Parramatta North as the favourable site for cultural facilities in LGA. These uses could be prioritised for the ‘Heritage Core’ and ‘Gaol’ to renew their role with the community by 2026 (refer D9.P1). In line with Big Move 3 “Activate and connect our community with vibrant, diverse and well connected public spaces and places”, Council supports the Strategy pursuing opportunities for temporary activation of the

Heritage Core and former Parramatta Gaol in consultation with landowners, which focus on community and cultural uses and consider potential funding arrangements.

The draft Strategy acknowledges the First Nations connection to the Country, however, there is opportunity to use this rich source of inspiration to inform and shape of the Strategy. 'Big Move 2' recommends a study to look at the pre-1788 landscape. Recognition of indigenous interpretation of the landscape is not currently evident in the draft Strategy and could be strengthened. Consideration should also be given to an oral history project in recognition of the fact that First Nations culture is a living culture and it is important to understand both contemporary cultural values as well as historic landforms.

Furthermore, Council delivers many cultural programs across the City as well as the new 5PS Discovery Centre which will share local stories of the City of Parramatta's cultural heritage through programming and heritage interpretation.

Recommendation:

- That the Draft Strategy be updated to reflect Council's contribution and expertise in relation to Aboriginal and Cultural Heritage as per the recommendations in **Appendix E**.

2.8 Infrastructure Funding

The Draft Strategy does not identify the range of social infrastructure, road and traffic improvements, public domain, stormwater and other infrastructure to support growth in the Westmead precinct. As detailed in above, Council recommends as a first step, DPIE, in consultation with Council, undertaking a comprehensive technical analysis to develop a local and state infrastructure list based on the precincts tested job and housing targets to 2036. The infrastructure should be costed and funding sources be identified to deliver the infrastructure in line with growth in the short, medium and long term.

Council has recently endorsed a draft City of Parramatta (Outside CBD) Development Contributions Plan 2020 to be placed on public exhibition shortly. The draft Plan is a Section 7.11 Contributions Plan, which, based on forecast population projections, identifies local infrastructure that will be needed to support the growth in the LGA. Council has identified local infrastructure needs for Westmead based on the growth projected by District Plan and Council's various strategic plans. However, if the draft Strategy enables additional residential and employment growth beyond what is forecast in Council's strategic planning framework, there is a risk that the quantum of local infrastructure outlined in the draft Development Contributions Plan would be insufficient to meet the needs of future residents, workers, and visitors in the Precinct.

Action D7.A3 states that a "Special Infrastructure Contribution or other regional funding mechanism for GPOP, including Westmead, to assist in the provision of infrastructure through development contributions for a growing Precinct." Council recommends that the state infrastructure funding mechanism be put in place upon implementation of the Strategy, or alternatively satisfactory arrangements, to ensure there is no long term funding shortfall.

In the event that DPIE put in place the Strategy, without the appropriate infrastructure identified and costed, Council would be limited to utilising voluntary planning agreements (VPAs) which would normally be associated with planning proposals and should not be solely relied upon to supplement the funding shortfall. This may result in Council pursuing lengthy and costly

acquisition processes to deliver critical infrastructure, including new road ways and open space.

Recommendations

- As part of the Strategy's finalisation, that the infrastructure needs for the precinct are identified (based on comprehensive technical work), costed with funding sources identified, and identified as either state or local infrastructure and delivered in line with growth (i.e. short, medium or long term).
- The NSW Government should put in place the Special Infrastructure Contribution or satisfactory arrangements to fund state infrastructure and services needed due greater density.

2.9 Implementation of the Strategy

2.9.1 Implementation of the Strategy's Actions

The Implementation section of the draft Place Strategy collects all the actions outlined in previous sections and assigns responsibility for delivery as well as a three-tiered timeframe (short, medium, long). There are 45 actions in total.

Of these 45 actions, 35 are allocated to Councils, that is Cumberland and City of Parramatta Councils. Noting in some cases, Councils are not the sole agency tasked with responsibility for implementation. It is also worth noting that of these 35 actions, some 22 involve the completion of studies of varying scales to support the realisation of the Westmead Place Strategy (these are listed at **Appendix G**). It is the view of City of Parramatta that many of these studies should inform the development of a Place Strategy rather than be developed after its adoption.

A key issue for Council, is the associated resourcing of the actions relating to studies and plans to be completed. According to a broad assessment by Council officers, if endorsed, the draft Westmead Place Strategy could cost as much as \$10 million to City of Parramatta Council to implement, over a period of ten years. Council seeks clarity from DPIE as to how the significant amount of work identified in the draft Place Strategy will be resourced, and specifically, what Council will be expected to pay for, and what DPIE will contribute with respect to funding.

Recommendations:

- That DPIE provide clarity on what funding it will provide to specific actions identified in the Place Strategy, as well as what Council will be expected to fund.
- That DPIE provide a commitment to assist with funding Strategies that have not already been completed by Council and the Westmead Alliance and further work to recalibrate these strategies once the traffic and transport work is completed.

2.9.2 Proposed Planning and Decision Makings Mechanism for Implementation

The Draft Strategy outlines the statutory planning mechanisms for the final Strategy to be implemented, which is the introduction of a 9.1(2) Ministerial Direction requiring planning proposals for new land uses or transport infrastructure within the Precinct to be consistent with the final Strategy. In other words, in order to enact the Strategy, Council's (Cumberland and City of Parramatta) must amend their LEPs through a planning proposal process.

Council believes that an introduction of a Ministerial Direction premature, until such time that the appropriate technical work, including a comprehensive traffic and transport study and the identification, costs and funding for infrastructure in the Westmead precinct is completed.

The (then) Urban Growth NSW's Parramatta Road Urban Transformation Strategy (PRUTS, 2015) similarly has a Ministerial Direction as its implementation mechanisms. In Council's experience, this has led to many issues when dealing with site specific planning proposal in the Granville precinct, of which the PRUTS applies. Although the PRUTS establishes a land use, built form framework and infrastructure schedule, it did not complete a precinct wide traffic and transport study to support the growth within precincts along the corridor. Each Council along the corridor, including Parramatta, have now been required to partner with Transport for NSW to complete this work. This has led to delays in processing site specific planning proposals, as well as setting unrealistic expectations for landowners in terms of time to process planning proposals and increases in densities within the Granville precinct. Council requests that DPIE do not follow the experience of PRUTS, rather complete the required work to support growth and change within the Westmead Precinct prior to setting expectations about potential growth.

Therefore as detailed in this submission, Council will support the implementation of the Strategy upon completion of the following work:

- That the Strategy should be reformulated into an Action Plan and sets out the key steps to continue and finalise the previous planning processes that was underway.
- That the critical transport and traffic study be commissioned and finalised, together with any remaining technical work.
- The infrastructure needs of the Precinct be defined and local and state infrastructure identified and costed.
- That land uses are identified (aligned with the Standard Instrument definitions) and include overarching job and dwelling numbers in line with current strategic plans and informed by key technical studies.

Reference is also made to previous discussion of the "City Deals" Framework previously in the Economic Development Section of this report. All three levels of government should agree on their respective roles and responsibilities and work together to identify shared delivery of elements like transport, access, industry support and amenity improvements. A City Deal, modelled on the Western Sydney City Deal, can help maximise impact of government investment in Westmead.

Part 3 –Summary of Recommendations

Council summarises below the actions identified in Part 2 of the submission. We trust that DPIE will consider and respond to these recommendations in finalising the Westmead Place Strategy.

Council Recommendations
Section 2.1 Land Use Planning
<ul style="list-style-type: none"> • That further clarification is required as to the proposed 'mixed use' land uses proposed under the Draft Strategy • That residential accommodation and tourist and visitor accommodation are not permitted under the final Strategy on existing SP2 zoned land, unless assured that it is for key worker housing which is associated with the health facilities and not strata subdivided and retained in ownership by Health NSW. • The proposed manufacturing and complementary uses not be located in this area. • That appropriate quantum and configuration of open space is provided (as detailed in the Section Open Space below) • That built form and urban design and economic feasibility testing be undertaken to set the appropriate planning controls that would incentivise opportunities for renewal as well as deliver good urban design outcomes. • The Draft Strategy should explicitly note and consider that any development in sub-Precinct 3 should be in accordance with the Conservation Agreement of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain. • The Draft Strategy should explicitly note and consider that any development in sub-Precinct 7 should be in accordance with the Conservation Agreement of the World Heritage Values and National Heritage Values of the Australian Convict Sites, Old Government House and Domain and Parramatta North Historic Sites Conservation Management Plans. • In relation to Parramatta North, the Strategy should recognise that DPIE Place should collaborate with NSW Treasury, Property & Development NSW, NSW Health, Transport for NSW University of Sydney, Greater Sydney Commission, City of Parramatta Council, Deerubbin LALC and Dharug to ensure any future planning, prospective development yields or business case by these stakeholders is aligned for sustainable growth and achievable renewal. The "City Deal" which is also discussed and supported later in this submission is a key part of this process. • The planning for Sub-Precinct 7 in the final Strategy, should demonstrate in-depth analysis of built form options based on character, built form and scale, heritage relationships, transport integration and economic feasibility to guide future planning for the area. • The Heritage Precinct containing the Former Female Factory and associated nationally listed items should be formally recognised as part of Parramatta Park and be managed by Greater Sydney Parklands (formerly Parramatta Park Trust) in conjunction with the World Heritage Listed Old Government House • That the Strategy be amended to recognise and utilise the previous work undertaken by DPIE, GSC and the Westmead Alliance, in order for the Strategy to be finalised, be reformulated into an Action Plan. • That the existing technical studies already undertaken for the precinct be synthesized and the infrastructure needs of the Precinct be defined and local and state infrastructure identified and costed. That the key next step should be the transport capacity analysis to

<p>validate the built form and urban design analysis and economic feasibility work already undertaken.</p> <ul style="list-style-type: none"> • Prior to implementation that the draft Strategy identify land uses (aligned with the Standard Instrument definitions) and include overarching job and dwelling numbers in line with current strategic plans and informed by key studies (traffic, flooding, social infrastructure assessment). • Following the lodgment of this submission Council will consider a more detailed report on how future Planning Proposals might be managed between now and implementation of the Strategy and what position Council should take on whether Development Applications, including State Significant Development Applications, should progress ahead of the implementation of any Strategy.
<p>Section 2.2 Traffic and Transport</p>
<ul style="list-style-type: none"> • That prior to implementation of a Strategy for Westmead that a comprehensive traffic and transport study is undertaken which considers the cumulative impact of growth and the broader population increases projected for the wider GPOP area. The study should include modelling and analysis of current and future traffic flows. • Recommended that appropriate traffic management solutions for schools in Westmead are considered as part of the traffic and transport work. • That the Westmead Place Strategy maps be updated to include missing information relating to active transport as detailed in Appendix C of this submission. • That the traffic and transport study identify critical new connections for within the precinct. • That a pedestrian movement analysis be undertaken to understand the best location for different activities to make them successful (including their economic success) and highlight issues and propose solutions in relation to connectivity and capacity of the streets.
<p>Section 2.3 Open Space</p>
<ul style="list-style-type: none"> • That the technical assessment in relation to open space and recreation undertaken to date by both the Westmead Alliance, City of Parramatta and DPIE be drawn on to inform the final Strategy. • That prior to finalisation the Strategy identify associated land for dedicated open space, in accordance with Figure 3 which includes: <ul style="list-style-type: none"> ○ The NSW Government-owned land be increased to the size to accommodate a sports field; and ○ The riparian zone identified in Figure 3 be increased to have a minimum set-back of 20 metres to 40 metres along all banks of Toongabbie Creek, Parramatta River and Duck Creek. • That the Strategy provides associated funding to ensure that adequate open space is delivered.
<p>Section 2.4 Community Infrastructure</p>
<ul style="list-style-type: none"> • That Action D7.A1 be removed with the acknowledgement that this work has already been completed by City of Parramatta Council. It should be replaced with the following action, with “Councils” remaining the responsible authorities: <ul style="list-style-type: none"> ○ “Implement the Westmead recommendations in City of Parramatta’s Community Infrastructure Strategy 2020 and the Department-commissioned community infrastructure needs assessment for Westmead South.”

- That the preferred location for key community infrastructure be identified in the final Westmead Place Strategy, noting the priorities for placement of community infrastructure in City of Parramatta's Community Infrastructure Strategy.
- That Direction 7 and associated actions of the draft Strategy be updated to include the need for childcare services.
- That Direction 8 of the draft WPS be revised to allocate responsibility for the investigation and development of social housing to the Land and Housing Corporation (LAHC).
- That the WPS sets affordable housing targets associated with provision of a percentage of the uplift value within new developments in Westmead, being 10%, to align with actions in the *Plan for Growing Sydney*.
- That DPIE engage with the NSW Department of Education to correctly identify the sites for new and expansion of existing schools in Westmead to accommodate the increase in residential population as part of the Draft Strategy.
- That new Primary and Secondary schools be located in Westmead South (Cumberland Council), rather than Westmead North (City of Parramatta) due to the location of planned residential development as well as the existing transport network constraints experienced in this part of Westmead.

Section 2.5 Economic Development and Smart Cities

- That the Westmead Place Strategy be the basis upon which a 'City Deal' for Westmead is negotiated to deliver the critical supporting infrastructure required to realise the vision for Westmead as an Innovation District.
- That the draft Strategy proposed land uses changes that realise the future economic activity within the Precinct are underpinned by the appropriate technical analyses.
- Amend Action D9.A1 to include investigation of additional tourism opportunities, including heritage-based tourism and medical tourism for Westmead.
- That Objective 1, Actions D3.A1, D3.A2 be amended to link to the Greater Parramatta Smart Cities Plan, which is due to be delivered in 2020-21 as part of the NSW Smart Places Strategy.
- Amend planning priority D3.P1 be amended to reflect "other smart infrastructure and technology" (not just transport communication and energy efficiency) that have the capacity to improve the performance, productivity and experience of Westmead.
- Amend Action D7.A5 –smart city infrastructure should be planned and integrated in any public domain plan for Hawkesbury Road.
- Propose a new Action which requires standards that the smart city infrastructure would either integrate seamlessly with current systems operating within the Greater Parramatta to Olympic Peninsula area, or be viable to be rolled out across the Greater Parramatta to Olympic Peninsula area.
- Proposed new Action to implement the monitoring of waste production, water and energy use through smart infrastructure in real time, over time, which will inform the effectiveness of the initiatives delivered under D11.A2.

Section 2.6 Sustainability, Green Grid Network and Flooding

- That Direction 10 "A city in Landscape" shall contain additional actions that directly improve Parramatta River water quality and recognising and address local biodiversity protection and enhancements.
- That Direction 11 "An efficient city" include and align energy and water targets with NSW Government strategies and associated targets and opportunities are identified in early planning for supporting energy and water infrastructure.
- That Direction 12: "A resilient city" include planning priorities and actions relating to urban heat.
- That Council and DIE work closely together to establish and refine the Green Grid Network for the Westmead Precinct, and this work aligns with the recommended principles and further consideration contained in **Appendix D** of this submission.
- Further technical investigation regarding overland flooding, risk assessment, capacity of existing stormwater drainage network, upgrade requirements to existing stormwater

drainage system to accommodate the proposed Westmead Place Strategy including details of planning elements will be required for further assessment.
Section 2.7 Heritage
<ul style="list-style-type: none"> • Council seeks further detail on the proposed method of relocation, future location and impact of the heritage significance of Willow Grove to allow for an assessment of the proposed relocation. • Further that the Draft Strategy awaits the proper site selection assessment process to be carried out as part of the Powerhouse approval, prior to identifying Parramatta North as the final location for Willow Grove. • That the Draft Strategy be updated to reflect Council's contribution and expertise in relation to Aboriginal and Cultural Heritage as per the recommendations in Appendix E.
Section 2.8 Infrastructure Funding
<ul style="list-style-type: none"> - As part of the Strategy's finalisation, that the infrastructure needs for the precinct are identified (based on comprehensive technical work), costed, and identified as either state or local infrastructure and delivered in line with growth (i.e. short, medium or long term). - The NSW Government should put in place the Special Infrastructure Contribution or satisfactory arrangements to fund state infrastructure and services needed due greater density.
Section 2.9 Implementation
<ul style="list-style-type: none"> • That DPIE provide clarity on what funding it will provide to specific actions identified in the Place Strategy, as well as what Council will be expected to fund. • That DPIE provide a commitment to assist with funding Strategies that have not already been completed by Council and the Westmead Alliance and further work to recalibrate these strategies once the traffic and transport work is completed.

Appendix A: Westmead Alliance member organisations

The Westmead Alliance was formed in 2013 and arose from a shared commitment among its members to better plan for the future of Westmead. The below includes the member organisations of the Westmead Alliance as at April 2019. Member organisations include local government authorities, public and private health providers, chambers of commerce, a Catholic Diocese, universities and a Local Aboriginal Land Council.

Figure A: Member Organisations of the Westmead Alliance



Appendix B: Current Planning Proposals in Westmead

City of Parramatta Council currently has two planning proposals that sit within the draft Westmead Place Strategy boundary 93 Bridge Road which and 12A Mons Road (Refer location map Figure B1 below).

Figure B1: Location of the current Planning Proposals in Westmead



93 Bridge Road Westmead

On 26 March 2019, a site-specific Planning Proposal was lodged for the site at 93 Bridge Road, Westmead. The Planning Proposal seeks to increase the floor space ratio control from 1.7:1 to 6:1 and increase the height of buildings control from 20 metres to 132 metres. The R4 High Density Residential zoning was to be retained, however the applicant is seeking to introduce hotel and motel accommodation and serviced apartments as additional permitted uses on the site.

Council Officers advised the applicant that the Planning Proposal could not be supported as it was premature to consider a Planning Proposal of this scale prior to the finalisation of the Westmead Master Plan, and the proposed planning controls were an over-development of the site that would result in unfavourable built form outcome. As demonstrated in Figure 4 the proposed tower at 132 metres is out of context with the existing surrounding 20 metre residential flat buildings. Traffic outcomes would set an undesirable precedent for excessive number of additional dwellings adding to the road network without a comprehensive precinct-wide traffic analysis being undertaken. Following detailed testing by Council Officers, the applicant was advised that a Planning Proposal seeking a FSR in the order of 2-2.5:1 may be supported, subject to additional urban design analysis being completed that demonstrates an appropriate built form can be achieved.

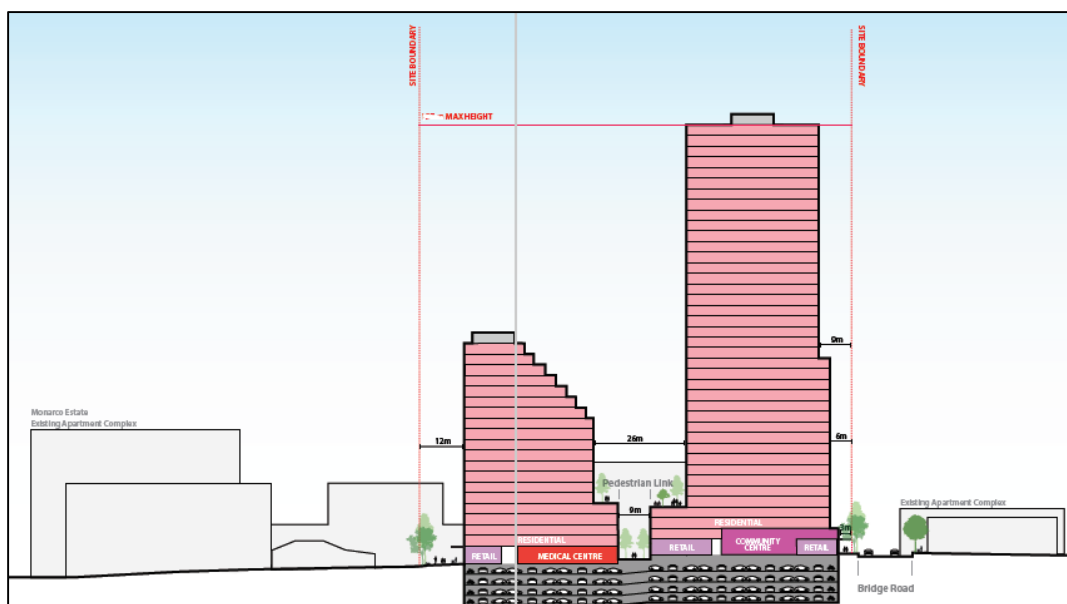


Figure B2: A cross section demonstrating the contextual differences between the proposed building envelope (in pink) and surrounding residential buildings.

On 24 April 2020, an amended Planning Proposal was submitted to Council which sought the same FSR and height controls, but proposed to increase the proposed number of build-to-rent apartments. The applicant did not specify which planning mechanism would be used to ensure the delivery of the build-to-rent apartments. Council Officers reiterated their previous advice that a Planning Proposal of this scale cannot be supported, particularly as the outcomes of any Westmead Master Plan were not publicly released, and that the increase of the build-to-rent component did not mitigate the adverse urban design and traffic impacts.

Following the release of the Draft Westmead Place Strategy, the applicant submitted a further amended scheme on 23 December 2020 which sought 'base case' FSR and height controls of 4.5:1 and 78 metres respectively, and an 'added value' scheme of 6:1 and 132 metres respectively. The applicant has not specified what mechanism will be used to distinguish between the 'base case' and 'added value' schemes, but it is noted that both of the FSR and height controls under these schemes were previously proposed and Council Officers do not support either schemes.

12A Mons Road, Westmead

On 1 November 2019, a site-specific Planning Proposal was lodged with Council for the site at 12A Mons Road, Westmead (Westmead Private Hospital). The Planning Proposal seeks to facilitate the Hospital's 'Stage 4' redevelopment by increasing the floor space ratio control from 1.5:1 to 2:1 and increasing the height of buildings control from 12 metres to part 18 metres and part 68 metres (on the south-east portion of the site).

The subject site is identified as being flood affected and Council Officers have requested that the proposal demonstrate how the intensification of uses on the site can mitigate flood impacts and the development does not present any additional hazards to people in and around the building.

The applicant has agreed to complete additional flood studies in order to address Section 9.1 Direction – Direction 4.3 Flood Prone Land. The outcome of this study will inform whether the Planning Proposal can be supported by Council Officers or not, noting that the assessment of the design component of the Planning Proposal has not concluded and requires additional interrogation.

Appendix C: Proposed Amendments to the Draft Strategy – Active Transport

Table C1 - Proposed Amendments Draft Strategy

Page No.	Section / Heading	Comment
6	Strategically Aligned	Reference should be added to the Principal Bicycle Network being developed by TfNSW
21	A well-connected city	Add action under planning priority D1.P1 as follows: “Revise and improve bus interchange facilities with development of new Westmead Metro Station”
21	A well-connected city	Under Planning priority D1.P3, add action to review how streets can be optimised for improved pedestrian, vehicular and public transport flow. (Darcy Road, for example, could benefit from such a review)
22	A well-connected city	Amend Plan of Active Transport Network Figure 4 (as per Figure C1 below) to include the following existing and proposed shared paths / cycleways:
23	A well-connected city	Amend so that all references to pedestrians also include cyclists
23	Planning Priority D2.P4	Add “improve active transport links by provision of new regional connections to the M4 Cycleway”
23	Objective 1	Add Planning priority for a Cycling and pedestrian link across the railway to connect the Mays Hill Precinct of Parramatta Park via the Governor’s Avenue Landbridge into Parramatta Park
54	Health and Innovation - Point 6 Rail Crossings	Add Governor’s Avenue Landbridge connecting the Mays Hill Precinct to the main Parramatta Park over the Western Rail Line
54	Health and Innovation - point 2 Permeability and Wayfinding	Add in extension of Hawkesbury Road towards the confluence of Toongabbie Creek, Darling Mills Creek and the Parramatta River then through to O’Connell Church should be considered in light of future traffic modelling
54	Health and Innovation, point 6, Rail Crossings	Strengthen word “Consider” to “Investigate” in “Enhance pedestrian amenity on Hawkesbury Road and Bridge Road between North and South Westmead. Consider a new underpass between these roads.”
55	Plan of Sub-precinct 2	Amendment Figure 13 Plan of Sub-Precinct 2 - Add missing existing cycleway network sections shown in green as per Figure C2 below.
56	Westmead East, point 5 Green Grid Connections	Include an outcome where the confluence of Darling Mills and Toongabbie Creeks are made a Place
57	Plan of Sub-precinct 3 (Figure 14)	Amendments to Figure 14 - Add Parramatta Park proposal for lit 2 Way People’s Loop Cycleway in green (refer Figure C3 below):
59	Plan of Sub-precinct 4	Amendments to Figure 15 - Add proposed shared path on south bank of Toongabbie Creek between Mons Rd and Redbank Rd in orange (refer Figure C4 below):

Page No.	Section / Heading	Comment
60	Northmead Residential, point 1 Amenity-Led Development	Should include further foreshore setbacks in a foreshore building line as part of any increase in housing supply as current interface with Toongabbie Creek is very narrow.
61	Plan of Sub-precinct 5 (Figure 16)	Amendment to Figure 16 - Add proposed shared path / cycleway along Bevan Street on proposed bridge crossing Toongabbie Creek in orange refer Figure C5 below.
62	Northmead Enterprise, point 2	Permeability and Wayfinding, add a connection between Kleins Road and Howard Ave would be beneficial in addition to the proposed shared path along Darling Mills Creek
	Northmead Enterprise, point 3	Creek Corridor, add key pedestrian and cycle links along Hunts Creek to Lake Parramatta and up Darling Mills Creek north of Church St towards Northmead High School
64	Plan of Sub-precinct 6 (Figure 17)	Amendment to Figure 17 - Add proposed shared path / cycleway along north bank of Darling Mills Creek passing under Church St towards Northmead High School, in orange refer Figure C6 below.
64	Parramatta North, under point 4 Permeability and Wayfinding	Add that PNUT has more ready interface with the Windsor Road / Church St buses. Currently the Cumberland Hospital precinct of Westmead is hard to access by public transport. Please add an interchange on the busy Church St bus corridor will be valuable, particularly when you also include interchange with Pennant Hills Road buses.
65	Plan of Sub-precinct 7 (Figure 18)	<p>Amendment to Figure 18 - Add proposed shared path / cycleway along south / west bank of Parramatta River under Bridge Rd from Wisteria Gardens to Toongabbie Creek confluence, in orange (Refer Figure C7 below).</p> <p>Clarification of proposed 'potential new pedestrian creek crossing' between Parramatta Park and Parramatta North. Accessibility improvement for this space is supported, however there are historic 'ha-ha's' (i.e. a recessed landscape feature), an historic wall and a native flying fox colony along the eastern embankment. Careful consideration of these constraints is needed.</p>
67	Action D1.A2	should be set to a Short Timeframe as walking initiatives should encourage people to be the first trip of choice and accordingly made most attractive.
67	Action D2.A4	should be set to a Short Timeframe as walking initiatives should encourage people to be the first trip of choice and accordingly made most attractive.
74	Action D10.A3	Add note all bridges should cross waterways perpendicular to the banks and flow to minimise impacts and maximise quality of views and amenity for users

Figure C1 – Amendments to Figure 4 of the Draft Strategy

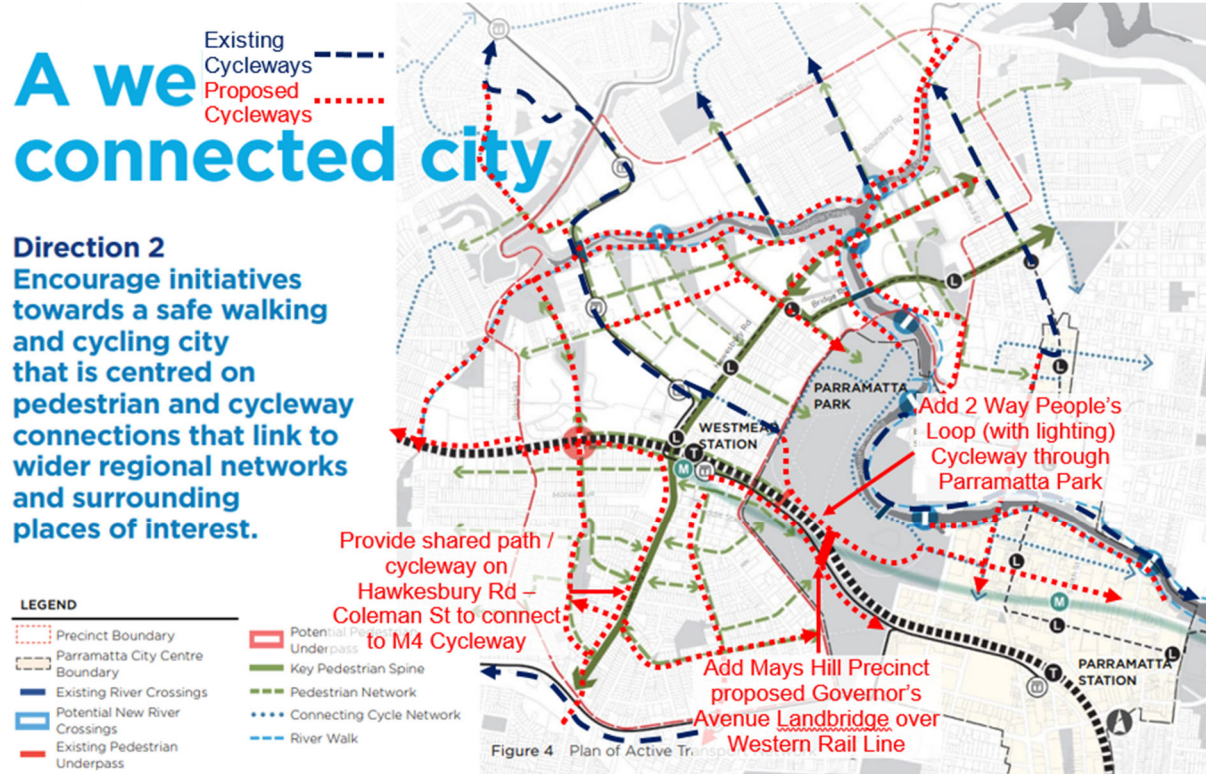


Figure C2 - Recommended amendments to Figure 13 of the Draft Strategy

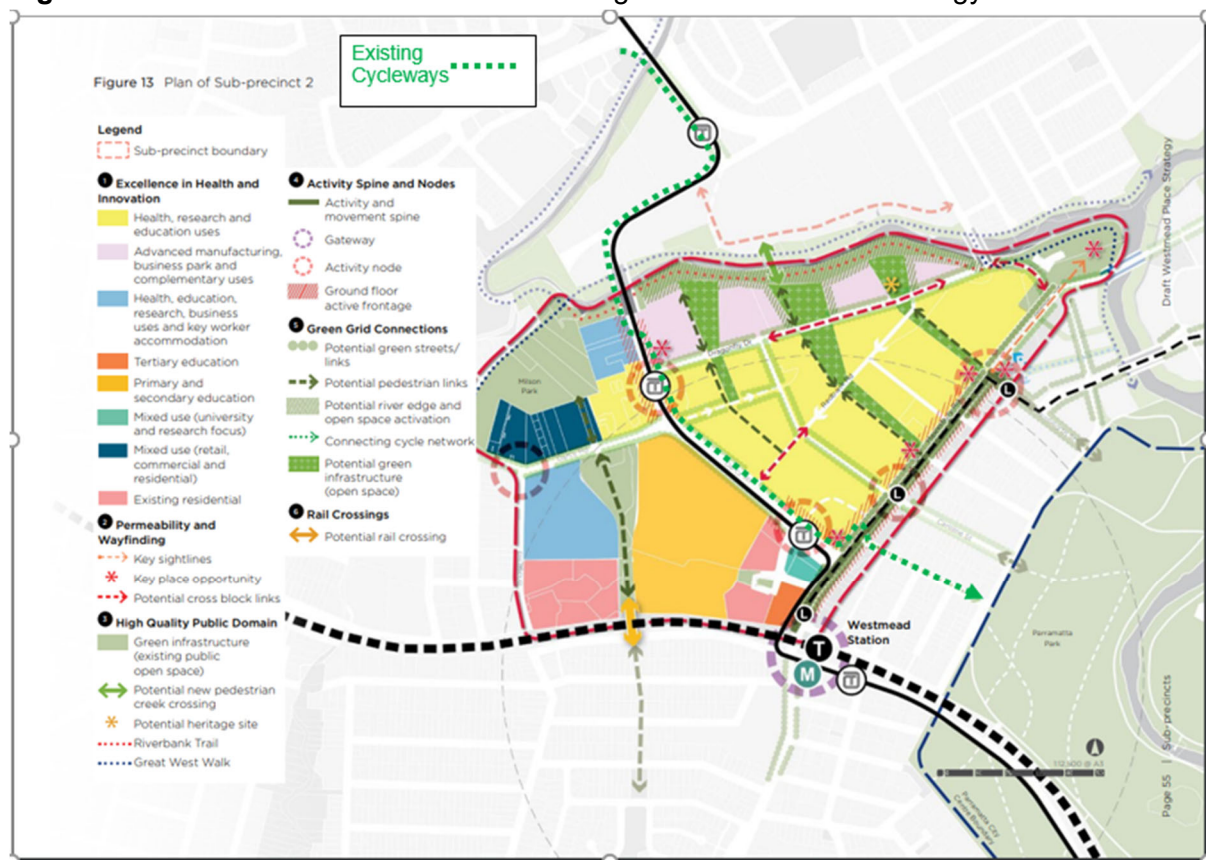


Figure C3: Recommended amendments to Figure 14 of the Draft Strategy

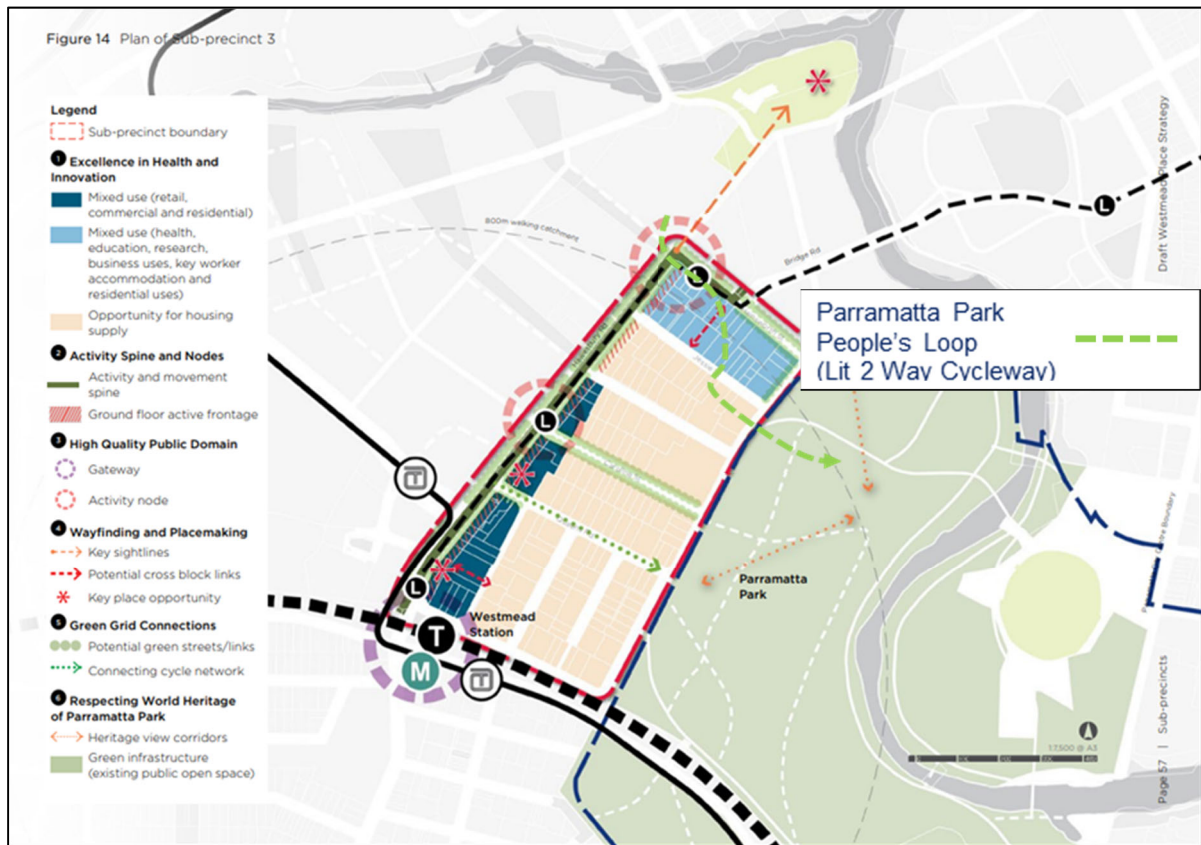


Figure C4: Recommended amendments to Figure 15 of the Draft Strategy

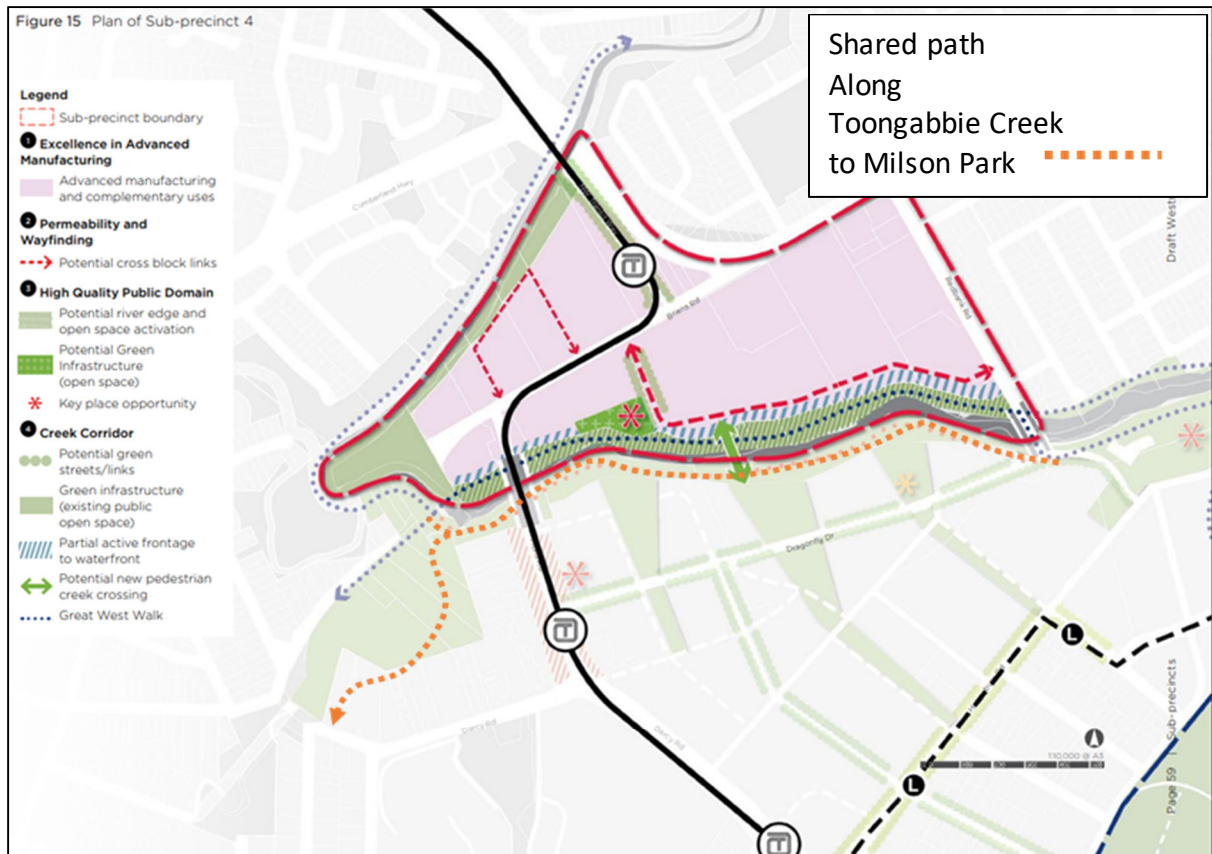


Figure C5: Recommended amendments to Figure 16 of the Draft Strategy

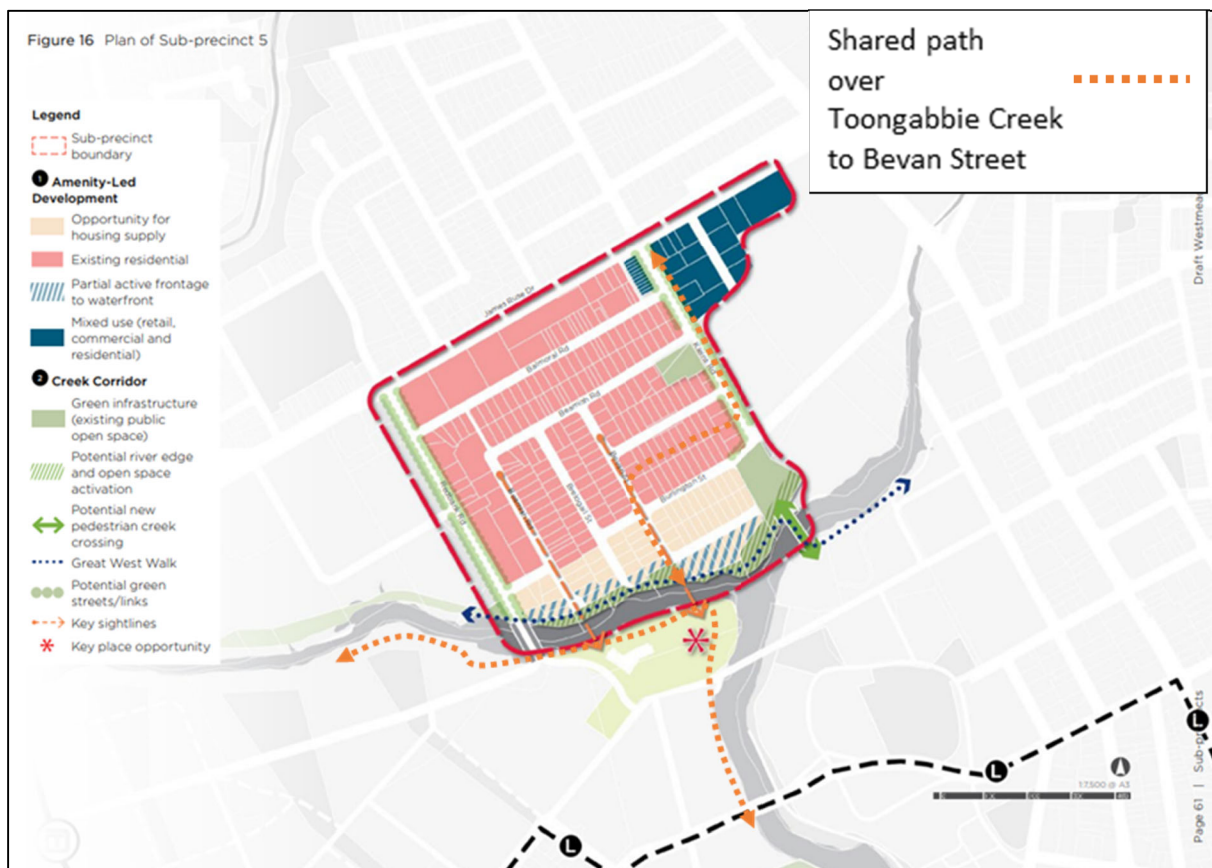


Figure C6: Recommended amendments to Figure 17 of the Draft Strategy

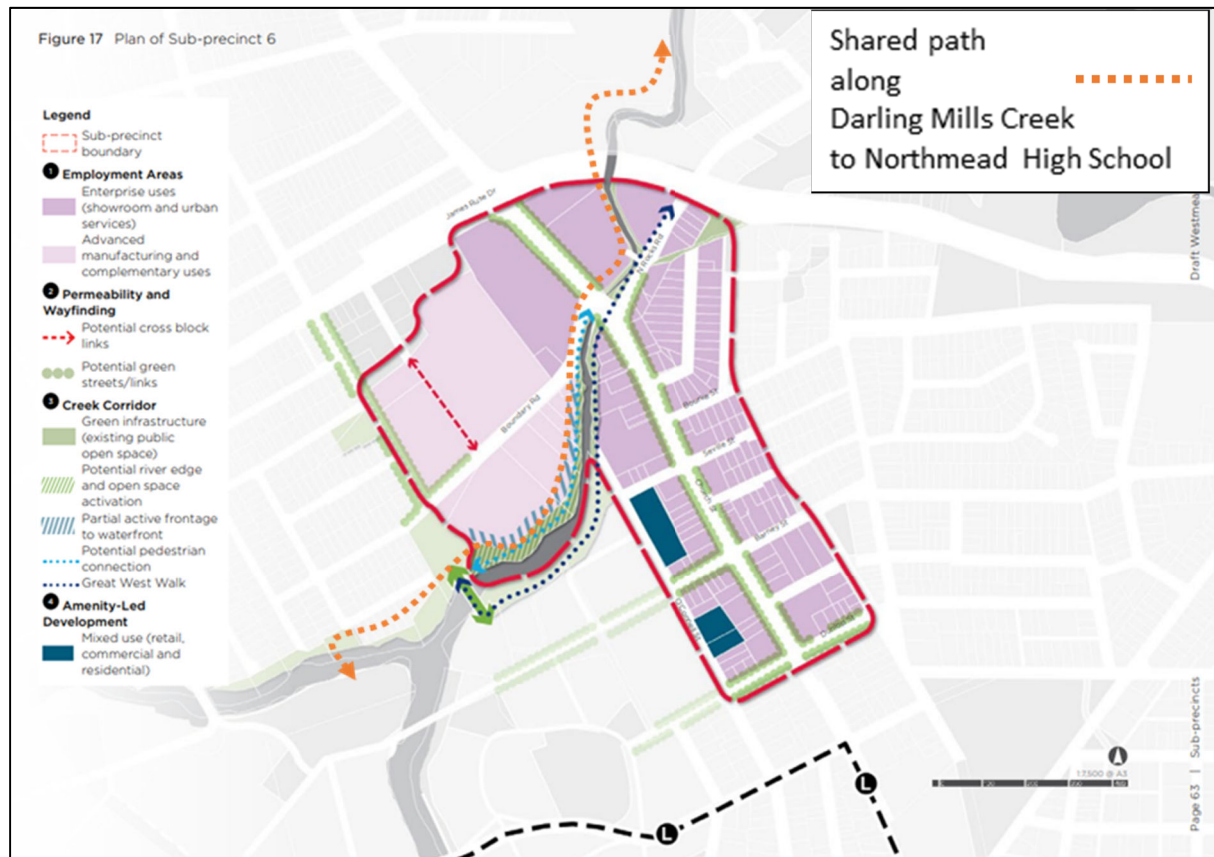
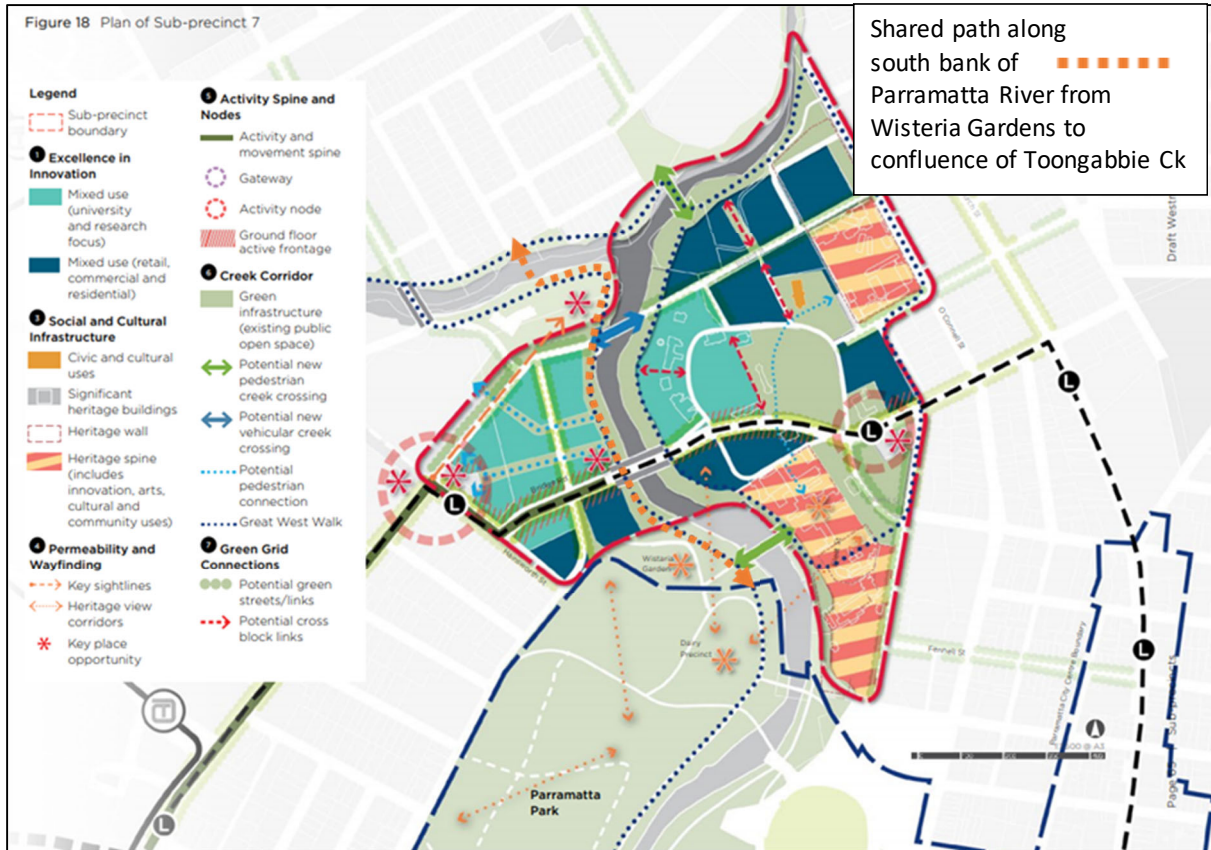


Figure C7: Recommended amendments to Figure 18 of the Draft Strategy

Figure 18 Plan of Sub-precinct 7



Appendix D: Recommendations the Green Grid Network

D1 Key Principles for Green Grid planning within Structure Plan for Westmead

Several principles that should be considered as part of the structure plan to illustrate a stronger vision and a better spatial arrangement for the corridors including:

- a) **Setbacks:** Generous development setbacks and alignments from the creek and river embankments - These will define the value of the corridor within the precinct, the open space available, the environmental functions, the recreation opportunities that can be provided as well as access options along with the character and amenity. The current structure plan appears to encroach on the riparian zone and limits the potential for any significant recreation or environmental opportunities.
- b) **Topography:** Consideration of the impacts of topography when locating development. Toongabbie Creek, Darling Mills Creek and Parramatta River have significant embankments at this point in the catchment the proximity and level of development to the waterway can have significant impacts on the character, access and useability of the space in between.
- c) **Waterway flow:** Consideration of waterway flow, function and quality when locating development, flooding, wetlands and riparian zones. The structure plan appears to identify development in zones that currently perform water storage and treatment functions. Flooding and water quality appear only to be mentioned as actions for further investigation and there is limited consideration on the space required within the green grid corridors needed to facilitate these outcomes.
- d) **Community infrastructure:** Consideration of City of Parramatta's Community Infrastructure Strategy and the functions and recreational activities that will need to occur within the corridor. Large recreational facilities need to be identified early to ensure that designated open space envelopes can accommodate what is required. The 3 'open space' corridors identified south of Toongabbie Creek are fragmented from the river corridor, have poor aspect and do not have the scale to provide significant recreational activity.
- e) **Corridors:** Corridors need to be considered as a sequence of places. Moments of recreational activity and engagement need be established throughout the length to generate a mix of use and activation and the benefits of co-location. 'Recreational opportunities' are currently only identified in the structure plan at the confluence of Parramatta River.
- f) **River crossings:** Crossing design needs to respond to the river topography and alignment. Current plan shows bridges and street alignments crossing in a non-perpendicular alignment to the river. This will greatly increase the impact these structures will have on the spatial character of the river.
- g) **Walking and cycling:** A clearly co-ordinated and prioritised walking and cycling network that supports the delivery of integrated open space and community facilities is required. The current plans have often confusing hierarchies and keys. Cycling is also generally omitted from the plans but will be a critical component of any green grid corridor development.

- h) **Open space interface:** Public frontages to the green grid corridors and open space need to be prioritised along their length. The current plans have limited street frontage and lack a clear direction on development interface.

D2 – Additional Recommendations

- a) **Delivery** - A clear process and mechanism for delivering the green grid and associated open space. The current actions identify new open space (which we assume would include green grid corridors) to be delivered through 'localised place-based planning'. Further detail is required on how this will fit within a larger framework and enable the delivery of cross-stakeholder regional scaled green grid corridor and other infrastructure outcomes.

That a stronger delivery framework be identified for facilitating planning of the Green Grid Corridors. At the minimum it should be made clear that the precinct wide open space and public domain strategies will lead the "localised place-based planning" identified in D10.A2. Preferably it would involve the development of a Green Grid Corridor Spatial Framework in partnership with Council.

- b) **Site Conditions** - Greater legibility, consistency and identification of local context and site conditions are required. Further discussion with Council is recommended to help refine maps.
- c) **Cultural Importance** - A clearer identification of the cultural importance of the river and creek corridors needs to be communicated. Under direction 9 there needs to be greater emphasis on the importance of the river from an indigenous heritage perspective as well as it as a future cultural destination and component that ties together the various heritage items within the precinct.
- d) **Prioritisation and Representation** - The structure plan be refined to improve the representation and prioritisation of the Parramatta River, Darling Mills Creek and Toongabbie Creek corridors. That the Parramatta River, Toongabbie Creek and Darling Mills Creek corridors are included in the 'sub-precincts' to give greater priority to the co-ordination and delivery of these green grid corridors. This approach would also align with the approach taken by Parramatta Park in their recent CMP and POM document 'Your Parramatta Park 2030'.
- e) **Synthesis of Plans**- A further action be identified to develop and walking and cycling network plan that complements both the public domain strategy and the open space strategy.
- f) **Finlayson Creek** – should be identified as an important green grid connection to Wentworthville and the role of Toongabbie Creek and Parramatta River as regional corridors be emphasised and clearly identified in priorities in sections such as direction 2 and 10.
- g) **The connection of Darling Mills Creek to Lake Parramatta** – should be identified in all walking and cycling network maps
- h) **Action D2.A3** (new development on waterways to encourage wayfinding, amenity, passive surveillance and access) - Add NSW Government to the responsibility column, this action cannot be completed without partnership. The majority of new development

fronting the river in the place strategy is on state owned land which will have the greatest impact on the quality and delivery of the Green Grid corridors.

- i) **Action D10.A2** (Delivery of new open space), remove “and/or” pre-qualification from action. New open space is required to meet any proposed growth or delivery of green grid corridors, this should not be ambiguous. Delivery needs to be co-ordinated through over-arching strategies and the potential to deliver should not be blocked through the fragmentation of the planning process.
- j) **Action D10.A3** (delivery of new pedestrian bridges across Toongabbie Creek and Parramatta River) - Change to a shared State Government, Stakeholder and Council responsibility. State Government is the primary landowner of the creek and river corridor foreshores and waterways, new crossings can only be delivered in partnership.

Appendix E: Recommended amendments relating to Heritage

In relevant sections of the Draft Strategy, Council's contribution and expertise should be acknowledged as follows:

Page No.	Section / Heading	Council officer comment
11	Big Move #2	<p>Amend fourth point as follows:</p> <p>Operate and curate museum, cultural and event programming, aligned with <u>City of Parramatta Council, Parramatta Aquatic and Leisure Centre, Bankwest Stadium</u>, Parramatta Gaol, Riverside Theatre, Powerhouse Parramatta and other Parramatta and GOP cultural and community planning initiatives.</p>
56	Wayfinding and Placemaking	<p>Amend as follows:</p> <p>Protect sightlines along Hawkesbury Road and the views from Parramatta Park towards the sub-precinct. Improve the pedestrian experience through new placemaking interventions such as public art, <u>heritage interpretation</u>, signage, seating, new public spaces for gathering.</p>
64	Respecting the World Heritage of Parramatta Park	<p>Amend as follows:</p> <p>Ensure built form planning controls are designed to promote renewal in balance with respecting the heritage significance of Parramatta Park, <u>including intangible heritage and built heritage such as</u> Old Government House and Domain.</p>
73	D9.A2	<p>Amend as follows:</p> <p>Ensure development and planning proposals identified within activation areas and nodes create a unique sense of place and contribute to a high-quality public domain, with consideration to Government Architect's 'Designing with Country' <u>and Council's Heritage Interpretation Guidelines</u>.</p>

Appendix F: Council's resolution in relation to Willow Grove (Powerhouse Parramatta State Significant Development SSD-10416)

Council resolved the following at its Ordinary Meeting on 9 November 2020 the following in relation to Willow Grove. (It is noted that a rescission motion was lodged following this meeting, however it was put and lost on 30 November 2020, so the resolution herein was upheld).

(a) That Council reaffirm its support for the Powerhouse Parramatta noting the significant investment in new cultural infrastructure, jobs and the economy of Sydney's Central River City.

(b) That Council note the Proponent's Response seeks to retain St George's Terraces and relocate Willow Grove, as an alternative to its demolition.

(c) That Council note the Response does not include sufficient information on the method of relocation, future location or the impact of the heritage significance of Willow Grove to allow for an assessment of the proposed relocation.

(d) That, if the Proponent's final submission proposes to relocate Willow Grove, then Council conditionally support the relocation of Willow Grove, rather than its demolition, subject to an assessment of the method of relocation, future location and the impact of the heritage significance of Willow Grove.

(e) That Council approve the letter (at Attachment 1) to the DPIE replying to the Response and note the letter includes:

- a. the conditional support set out above in paragraph (d);*
- b. several design concerns including flooding impacts, the undercroft, the podium landscape and the public domain;*
- c. other matters including Civic Link and the interface with Council land.*

(f) That Council acknowledges City of Parramatta long connection with heritage and our desire to retain those connections where possible.

(g) That Council acknowledges and gives unconditional support in that the only current suitable location for the Powerhouse Museum is its current proposed location and no other location within the City of Parramatta has immediate connections for transport, schools, workers, businesses and the community. Any other proposed location would ensure that the Museum would be a white elephant and not reach its full potential.

(h) That if we are faced with no other choice than the complete demolition and loss of Willow Grove or relocation as proposed by the NSW State Government, Council gives unconditional support to the said relocation.

(i) That while Council acknowledges a number of submissions in response to the EIS against the proposed Powerhouse Museum, it should be acknowledged that the vast majority of these submissions were from outside of Parramatta LGA and while important should carry minimal weight than the submissions received from within the Parramatta LGA. It must be acknowledged that the current population of the Parramatta LGA is approximately 234,000 and that the vast majority did not provide submissions.

*(j) That Council congratulate and acknowledge the dedication and hard work of the NSW State Government
and in particular Minister Harwin for seeing this project through to completion.*

(k) That Council encourages the NSW State Government works to resolve the outstanding issues raised by Council and proceed with the project as a matter of urgency to not only bring jobs to Parramatta but to deliver this world class institution to the people of Western Sydney.

(l) Further that, without further delay, the proposed letter attached to the motion be amended to reflect Council's position and that this letter be signed by the Lord Mayor and CEO and the Lord Mayor also write to the parties mentioned above advising them of Council's position.

Appendix G: List of supporting studies identifying Council as a responsible agency

Action #	Additional Studies / Actions	Responsibility	Timeframe
D2.A1	Precinct wide Public Domain Plan with a focus on – corridor widths; active frontages, wayfinding, high quality public domain; pedestrian safety and amenity; durability; passive surveillance; and place identity.	Councils	Short / Medium
D2.A5	Prepare a place based integrated transport and traffic study to support future rezonings	DPIE, Councils and TfNSW	Short / Medium
D3.A1	Prepare a smart cities strategy for the Precinct which identifies opportunities for the provision of infrastructure including but not limited to: driverless and airborne vehicles; automated wayfinding; pedestrian movement; lighting; CCTV; solar energy; and 5G wireless public connections.	Councils, DPIE and stakeholders	Short
D7.A1	Prepare an open space and social infrastructure needs assessment based on projected population growth and identify mechanisms for future funding.	Councils	Short
D7.A5	Develop a public domain plan for Hawksbury Road with a focus on street trees; lighting; furniture; materials palette.	Councils	Short
D8.A2	Undertake further studies for housing intensification and diversification within 800m of Westmead Station and in proximity to open space amenity to provide options for student accommodation, key worker, social and affordable housing.	Councils	Short
D8.A3	Undertake an urban design and supporting studies to understand the scale of future housing renewal, ensuring it respects solar access, views and vistas to open spaces and places of significance. Urban Renewal must consider potential for heritage significance and character.	Councils	Short
D8.A5	Undertake a study to determine feasibility and incentive mechanisms study for key worker, social and/or affordable housing	Councils	Short
D9.A1	Prepare a place brand strategy to communicate Westmead's competitive identity.	Councils and Stakeholders	Short
D9.A3	Prepare an activation and events program that brings together Council's key stakeholders, industry's partners and community groups to raise the profile of Westmead.	Councils, Stakeholders, Community Groups	Short / Medium

Action #	Additional Studies / Actions	Responsibility	Timeframe
D9.A4	Prepare a built form strategy that considers visual impact to heritage view corridors.	Councils	Short / Medium
D10.A1	Develop a precinct-wide open space strategy and identify opportunities to improve existing parks, connect cultural spaces, historic sites and key places with consideration to Government Architect NSW 'Draft Greener Places Design Guide'.	Councils, DPIE, state agencies and stakeholders	Short
D10.A3	Provide new pedestrian crossings across Toongabbie Creek and Parramatta River to create enhanced connectivity throughout the precinct.	Councils	Short / Medium
D10.A4	Prepare a precinct-wide urban tree canopy and streetscape plan which increases tree canopy cover, and improves the amenity of streets and open space, with consideration to Government Architect NSW 'Draft Greener Places Design Guide.'	Councils and DPIE	Short / Medium
D11.A2	Develop initiatives for water, waste and energy efficiencies that consider the reduction of carbon emissions.	Councils and Stakeholders	Short / Medium
D12.A1	Prepare an infrastructure resilience assessment and study that provides recommendations to implement the Resilient Sydney Strategy in Westmead.	Councils	Short
D12.A2	Undertake precinct-wide emergency planning and prepare recovery interventions.	Various levels of government and stakeholders	Short / Medium
D12.A3	Undertake Precinct-wide planning for the various flood events and address through local planning.	Councils	Short / Medium